.

COMMENT 5: A one time sampling of leachate sumps for VOC's is not acceptable. Sampling for VOC's in the leachate sumps must be annual until a post-closure permit is issued. More than one sampling event is required to confirm the absence of VOC's, particularly since the S-laggon material has yet to be placed in the landfill. The need for continued VOC monitoring can be addressed during review of the post-closure permit application.

COMMENT 6: It is agreed to drop the monthly indicator parameter sampling.

COMMENT 7: An annual evaluation of liner performance during the interim monitoring period is acceptable. The data, however, must be submitted as it is obtained. The evaluation procedures are acceptable as listed.

A revised leak detection monitoring program or a response to these comments must be submitted to this office by August 20, 1993. Initial testing must begin within 30 days following approval of the plan as was proposed in your letter. If you have any questions, please contact me.

Sincerely,

David Slayton

Land Harton

Hazardous Waste Permits Section Waste Management Division

517-373-8012

CC: Ms. Elizabeth Browne, DNR-Shiawassee
 Ms. Liane Shekter Smith, DNR
 HWP/C&E File

NATURAL RESOURCES COMMISSION

> JERRY C. BARTNIK LARRY DEVUYST PAUL EISELE JAMES HILL DAVID HOLLI JOEY M. SPANO JORDAN B. TATTER



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909

ROLAND HARMES, Director

March 3, 1993

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RECORD CENTER Complesses

Mr. Jeff Hartlund Environmental & Safety Eng. Staff Ford Motor Company Suite 608 15201 Century Drive Dearborn, Michigan 48120

Dear Mr. Hartlund:

SUBJECT: Annual Groundwater & Leachate Reports

Allen Park Clay Mine (MID 980 568 711)

The Michigan Department of Natural Resources, Waste Management Division, Hazardous Waste Permits Section, is in receipt of your annual groundwater report, dated December 20, 1992, and your annual leachate report, dated February 26, 1993, for the Allen Park Clay Mine. These reports were submitted pursuant to conditions contained in your Act 64 Hazardous Waste Operating License for the facility.

Staff have reviewed both of these annual reports and find that they meet the reporting requirements of 1979 P.A. 64, as amended (Act 64), which references 40 CFR 265..94(a)(2)iiii and 265.94(b)(2), and the requirements for leachate reporting contained in the company's Act 64 Hazardous Waste Operating License.

Sincerely,

Virginia L. Loselle

Environmental Quality Specialist Hazardous Waste Permits Section Waste Management Division

517-373-7974

cc: Ms. De Montgomery, DNR/U.S. EPA Reporting

Dr. Ben Okwumabua, DNR-Livonia

Ms. Elaine Bennett, DNR

Mr. Pete Quackenbush, DNR

HWP/C&E File

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NATURAL RESOURCES COMMISSION

LARRY DEVUYST PAUL EISELE AMES P. HILL AVID HOLLI JOEY M. SPANO JORDAN B. TATTER



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909 ROLAND HARMES, Director

February 10, 1993

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RECORD CENTER

Mr. Jerome S. Amber Wastes & Hazardous Substances Ford Motor Company Suite 608 15201 Century Drive Dearborn, Michigan 48120

Dear Mr. Amber:

Act 64 Permit Annual Groundwater Report SUBJECT:

MID 980 568 711

Your facility is permitted under Michigan Act 64, P.A. 1979, as amended. The permit requires that your facility submit an annual groundwater report by March 1 of each year. To date, this office has not received your report. Please send three copies of the report to:

> Geotechnical Support Unit Waste Management Division Michigan Department of Natural Resources P.O. Box 30241 Lansing, Michigan 48909

If there are any questions, please contact me. Response to this notification is due by March 1, 1993.

Sincerely,

Elaine Bennett

Bonney

Geotechnical Support Unit Waste Management Division

517-373-8028

cc: VDe Montgomery/U.S. EPA Livonia District Office HWP/C&E File

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VATURAL RESOURCES
COMMISSION
LARRY DEVUYST
PAUL EISELE
'AMES P. HILL
AVID HOLLI
, STEWART MYERS

JOEY M. SPANO JORDAN B. TATTER



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909 ROLAND MARMES, Director

RECEIVED SEP 1 4 1999
WMD RCRA
RECORD CENTER PL B

Jarith

January 28, 1993

Mr. Dave O'Connor Ford Motor Company, Clay Mine Oakwood Blvd. & Southfield Hwy. Allen Park, MI 48101

Dear Mr. O'Connor:

SUBJECT: Act 64 Permit Annual Groundwater Report

MID 980 568 711

Your facility is permitted under Michigan Act 64, P.A. 1979, as amended. The permit requires that your facility submit an annual groundwater report by March 1 of each year. To date, this office has not received your report. Please send three copies of the report to:

Geotechnical Support Unit Waste Management Division Michigan Department of Natural Resources P.O. Box 30241 Lansing, Michigan 48909

If there are any questions, please contact me. Response to this notification is due by March 1, 1993.

Sincerely,

Elaine Bennett

Geotechnical Support Unit Waste Management Division

517-373-8028

cc: De Montgomery/U.S. EPA
Livonia District Office

HWP/C&E File



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WASTE MAHAGEMENT D

Environmental and Safety Engineering Staff Ford Motor Company

Suite 608 15201 Century Drive Dearborn, Michigan 48120 January 27, 1992

Ms. Mindy Koch, Acting Chief Waste Management Division Michigan Department of Natural Resources P.O. Box 30028 Lansing, Michigan 48909

Subject:

Submittal of Environmental Monitoring Results

Ford Allen Park Clay Mine Landfill EPA ID No. MID 980 568 711

Dear Ms. Koch:

Enclosed, pursuant to Condition I.E.9.c of our Michigan Act 64 Operating License, are Act 64 soil (i.e., to establish background values), Cell I leachate and Cell I lysimeter monitoring results.

Should you have any questions regarding this submittal, please contact David O'Connor of this Office at 313/322-0701.

Sincerely,

Jerome S. Amber, P.E., Manager Industrial Waste and Toxic/ Hazardous Substances Environmental Quality Office 313/322-4646

Enclosures

cc: Mayors of Allen Park, Dearborn and Melvindale John Ciotti Joe Wisk



MAY 1 5 1991 Kent

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
ELLWOOD A. MATTSON
O. STEWART MYERS
RAYMOND POUPORE



John Engler JAMES J. BLANCHARD: Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING P.O. BOX 30028 LANSING, MI 48909

DAVID F. HALES, Director

May 13, 1991

Mr. Dave O'Connor Ford Motor Company Environmental Quality 15201 Century Drive, Suite 608 Dearborn, Michigan 48120

Dear Mr. O'Connor:

SUBJECT: Act 64 Permit Annual Reports

Ford Allen Park Clay Mine, MID 980 568 711

Thank you for your telephone call Thursday, May 9, assuring us that the 1990 annual summary reports had been sent for both leachate volume and analysis, and groundwater flow direction with a potentiometric contour map. The submittal dates you gave were helpful. The reports were on time and they are in our files.

Please make a note for future annual reports, that we require three copies, as we forward a copy to the DNR District Office and the Federal Government. Since we handle annual reports a little differently than quarterly reports, and since your annual contour map has no deadline date, it would be helpful for you to prominently mark your reports as Annual Reports. Alternatively, sending them to my attention would greatly facilitate tracking. Thank you for your cooperation.

If you have questions, please contact me at Waste Management Division, Department of Natural Resources, P.O. Box 30241, Lansing, Michigan 48909, or at the telephone number below.

Sincerely,

Elaine Bennett

EBUNNET

Hazardous Waste Permits Section

Waste Management Division

517-373-8028

cc: Ms. De Montgomery, DNR
Mr. Pete Quackenbush, DNR
S.E. Michigan District

HWP/C&E File

NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON MARLENE J. FLUHARTY GORDON E. GUYER KERRY KAMMER ELLWOOD A. MATTSON O. STEWART MYERS RAYMOND POUPORE

John Engler

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING P.O. BOX 30028 LANSING. MI 48909

DAVID F. HALES. Director

May 1, 1991

Mr. Dave O'Connor
Ford Motor Company
Environmental & Safety
Suite 608
15201 Century Drive
Dearborn, Michigan 48120

Dear Mr. O'Connor:

SUBJECT: Act 64 Permit Annual Reports

Ford Allen Park Clay Mine

MID 980 568 711

Your facility is permitted under Michigan's Hazardous Waste Management Act, 1979 P.A. 64, as amended. The permit requires under Part IV B.2.b. that your facility submit an annual leachate summary report by March 1 of each year. The permit also requires in Part IV A.2. an annual determination of groundwater flow direction and a potentiometric contour map. Please send three copies of each report to:

Geotechnical Support Unit Waste Management Division Michigan Department of Natural Resources P.O. Box 30241 Lansing, Michigan 48909

If there are any questions, please contact me. Response to this notification is due by May 15, 1991.

Sincerely,

Elaine Bennett

E. Benney

Geotechnical Support Unit Waste Management Division

517-373-8028

cc: Ms. De Montgomery, DNR
Mr. Pete Quackenbush, DNR
S.E. Michigan District
HWP/C&E File

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Waste Management covertty

Division

Environmental and Safety Engineering Staff Ford Motor Company

Suite 608 15201 Century Drive Dearborn, Michigan 48120

October 30, 1990

Mr. Alan Howard, Chief Waste Management Division Michigan Department of Natural Resources P.O. Box 30028 Lansing, Michigan 48909

RECEIVED NOV 0 6 1990

Subject: Submittal of Environmental Monitoring Reports

Ford Allen Park Clay Mine Landfill

EPA ID No. MID 980568711

"ASTE MANAGEMENT DE.

Dear Mr. Howard:

Enclosed, as required by our Michigan Act 64 Operating License, are monitoring reports for the following facility sampling programs:

1) lysimeter 1-B (lysimeter 1-A did not yield a sufficient aliquot of sample), 2) Act 641 surface water (to establish background), and 3) semi-annual Detroit Water and Sewerage Department leachate.

Should you have any questions regarding this submittal, please contact David O'Connor of this Office at 313/322-0701.

Sincerely,

Jerome S. Amber, P.E. Principal Staff Engineer

Environmental Quality Office

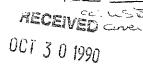
a. O. Connor for

313/322-4646

Enclosures

cc: Mayors of Allen Park, Dearborn and Melvindale
 Ardys Bennett
 Joe Wisk

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OTE MANAGEMENT

Environmental and Safety Engineering Staff Ford Motor Company

Suite 608 15201 Century Drive Dearborn, Michigan 48120

October 22, 1990

Mr. Alan Howard, Chief Waste Management Division Michigan Department of Natural Resources P.O. Box 30028 Lansing, Michigan 48909

Submittal of Environmental Monitoring Reports

Ford Allen Park Clay Mine Landfill

EPA ID No. MID 980568711

Dear Mr. Howard:

Enclosed are second quarter Act 64 surface water and semi-annual Act 64 sediment monitoring reports (to establish background) for the subject facility, as required by our Michigan Act 64 Operating License. Included also is a pH monitoring report of the facility sewage effluent, verifying compliance with Detroit Water and Sewerage Department requirements.

Should you have any questions regarding this submittal, please contact David O'Connor of this Office at 313/322-0701.

Sincerely,

Jerome S. Amber, P.E. Principal Staff Engineer Environmental Quality Office 313/322-4646

Enclosures

Mayors of Allen Park, Dearborn and Melvindale

Ardys Bennett Joe Wisk

OCT 23 1990

Waste Management Division

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MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

September 5, 1990

To:

Pete Quackenbush, HW Permits Section, WMD Donald Mbamah, SE MI Field Office, WMD

From:

Liz Browne, WMD Env. Monitoring Coordinator

Subject:

Ford Allen Park Clay Mine

MID 980 568 711

Several submittals related to the facility's environmental monitoring programs have been received. As these submittals deal with both District compliance issues and permit condition changes a joint district/permits memo is being generated. Much of the review deals with Ford's July 27, 1990 letter responding to Donald's June 28, 1990 letter. Additional reviews of the data submittals for the various monitoring programs have also been undertaken.

Comments to responses dealing with the facility's environmental monitoring program are as follows:

- 1. Issue: Leak detection lysimeters. The facility's plan to address problems with the lysimeters is acceptable. One caution is that the facility should understand that background for these units will still be non-detect. This is supported by Ford's data indicating that the water used during this project tested non-detect for the DNR Scan 7 and 8 compounds.
- 2. Issue: Sampling and analysis concerns from the 3/8/90 memo. Ford is requesting that new analytical methods and detection limits be allowed for the facility programs. As the laboratory has not changed, it is not clear why changes are being requested so soon after permit issuance. The changes requested are acceptable, however, there is still a major concern relative to this issue. The facility should seek approval of changes to the sampling and analysis plan that appears in their permit prior to implementation. If any of the changes suggested had not been approved, the facility would have had to address the deficiencies with their monitoring data.

The other items from the 3/8/89 memo have been adequately addressed at this time. Tracking of the facility's submitalls will have to be done to ensure that continued

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compliance is maintained. Items such as the apparent misinterpretation of the 10-11-89 DNR Scan 8 data will not be readily accepted in the future. The May 14, 1990 surface water data submittal is missing a value for arsenic. It is hoped that the new ownership and the new computer system at the laboratory will reduce problems with future data submittals. Both laboratory and facility staff should be encouraged to monitor the quality of the reports that are being submitted.

A copy of the updated analytical methods and detection limits for the inorganic constituents is attached. This new table should be incorporated into the facility's operating license to maintain it's accuracy.

Please let me know if you have questions on this memo. Reviews of future data submittals will continue, with emphasis on the manner in which the identified concerns are being handled.

cc: Ms. D. Montgomery√ HWP C&E File Permit File

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TABLE 6
Section N
Environmental Monitoring

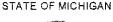
Parameter	Analysis	Det. Limit	Container/ Preservative	Holding Time
Iron Alkalinity Carbonate Bicarbonate Chlorides Sulfate Spec. Cond. pH Cyanide BOD COD TOC Phenolics Calcium Sodium	6010 (1) 310.1 (3) 403 (2) 403 (2) 407A (2) 9038 (1) 9050 (1) 9040 (1) 9010 (1) 405.1 (3) 410.4 (3) 9060 (1) 9065 (1) 6010 (1) 6010 (1)	0.02 mg/l 4 mg/l 4 mg/l 4 mg/l 4 mg/l 0.02 mg/l NA NA 0.02 mg/l 4 mg/l 1 mg/l 1 mg/l 0.002mg/l 0.02 mg/l	P, G, R P, G, N P, G, A, R P, G, A, R P, G, N P, G, N	6 mos 24 hrs 14 day 14 day 28 day 28 day 24 hrs D 14 day 28 day 28 day 28 day 28 day 28 day 28 day
Magnesium	6010 (1)	0.02 mg/l	P, G, N	28 day

- (1) EPA SW 846 "Test Methods for Evaluating Solid Wastes".
- (2) Standard Methods 16th Edition
- (3) EPA 600/4-79-020 "Methods for Chemical Analysis of Water & Wastes
- P: Plastic
- G: Glass
- R: Refrigeration
- T: Teflon-lined cap
- N: Nitric acid to pH < 2
- A: Sulfuric acid to pH < 2
- D: Determine on site
- S: Sodium hydroxide to pH > 12

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NATURAL RESOURCES COMMISSION

> RY C BARTNIK H J. CHARTERS RY DEVUYST AUL EISELE JAMES P HILL DAVID HOLLI JOEY M. SPANO





JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING, PO BOX 30028, LANSING MI 48909-7528

ROLAND HARMES, Director

REPLY TO: WASTE MANAGEMENT DIVISION LANSING MI 48909-7741

March 31, 1995

Ms. Karen McGrath 17028 Hamilton Allen Park, Michigan 48101

Dear Ms. McGrath:

Polychlorinated Biphenyl (PCB) Waste Disposal at the

Ford Allen Park Clay Mine

Thank your for your letter of March 2, 1995. Director Roland Harmes has asked me to respond to your concerns regarding the disposal of PCB waste at the Ford Allen Park Clay Mine facility.

The United States Environmental Protection Agency (U.S. EPA) has performed a thorough analysis of the options for managing the PCB sediments generated from the cleanup of the Ford Outfall superfund site in Monroe, Michigan. Based on that analysis the U.S. EPA has determined that disposal off-site by landfilling at a properly licensed facility is acceptable.

The PCB waste is specifically regulated under the federal Toxic Substance Control Act (TSCA) which is administered in Michigan by the U.S. EPA from the Region 5 office in Chicago. Under TSCA, Ford has the ability to apply to the U.S. EPA for a permit for disposal of PCB waste at the Allen Park Clay Mine. The U.S. EPA is required to review the application to determine if the proposed disposal satisfies the regulatory requirements of TSCA. The U.S. EPA's decision on whether to issue the permit will be based on the technical merits of the application and the relevant public comment regarding technical compliance with the TSCA regulations.

The Ford Allen Park Clay Mine is licensed under Michigan's Hazardous Waste Management Act, 1979 PA 64, as amended (Act 64) for the disposal of certain hazardous wastes. The Department of Natural Resources (Department) is currently reviewing Ford's application to renew that license and include the disposal of PCB waste. This review is based on the applicant's ability to demonstrate compliance with the hazardous waste regulations. Prior to making a final determination on the application, the Department will public notice a draft decision and conduct a public hearing.

In the event that a TSCA permit and Act 64 renewal license are issued to the facility, they will contain conditions to insure that the facility operation does not result in emmissions containing PCBs that adversely affect human health or the environment.

Thank you for providing your concerns. If you have any question regarding this information, please contact Mr. Peter Quackenbush, Senior Environmental Engineer, Waste Management Division, at telephone number 517-373-7397, or me.

Sinceredy.

Jim Sygo, Chief

Waste Management Division

51/7-373-9523

cc: Mr. Steve Johnson, U.S. EPA

Ms. Lorraine Kosik, U.S. EPA

Director Roland Harmes, DNR

Mr. Russell Harding, DNR

Mr. Ken Burda, DNR/HWP C&E File

Mr. Peter Quackenbush, DNR

Dr. Ben Okwumabua, DNR-Livonia

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

July 19, 1990

To: Pete Quackenbush, HW Permits Unit, WMD

From: Liz Browne, WMD Env. Monitoring Coordinator

Subject: Ford Allen Park Clay Mine, Allen Park, MI

MID 980 568 711

The Act 64 soil monitoring program that accompanied Mr. Jerome Amber's May 18, 1990 letter to Mr. Alan Howard has been reviewed, as requested. The items required by the facility's permit have been adequately addressed. The background soil monitoring points appear to be the most representative, considering that non-native materials have been used to create the haul roads. The map and the necessary revision of the monitoring program language have been made. A copy has been inserted into the HW Geotech copy of the permit.

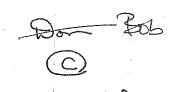
The information on the lysimeter installation reminded De Montgomery that a plan is due from the facility. She asked to be updated on the receipt of their lysimeter rehabilitation or replacement report. Please discuss this concern directly with her, as I am not familiar with all of the details on that issue.

Let me know if you have any questions regarding the facility's soil monitoring program.

cc: Ms. D. Montgomery / Mr. L. AuBuchon

HWP C&E File

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MAY 2 3 1990

VACTE MANAGEMENT DIV. 15201 Century Drive Dearborn, Michigan 48120

May 18, 1990

Environmental and Safety Engineering Staff Ford Motor Company

Mr. Alan Howard, Chief Waste Management Division Michigan Department of Natural Resources P.O. Box 30028 Lansing, Michigan 48909

Subject: Act 64 Operating License - Ford Allen Park Clay Mine Landfill

Dear Mr. Howard:

This letter provides resolution to issues associated with our Act 64 operating license addressed in your May 8, 1990 letter.

Part IV.D.1. The two leak detection lysimeters for Cell I were installed on February 8, 1990. The report entitled, "Lysimeter Installation at the Ford Allen Park Clay Mine Landfill" is enclosed (Attachment 1). Lysimeter 1-B (3549.9N, 7809.9E) was sampled on May 8, 1990 following removal of the rotary wash-water from the borehole (see discussion in Attachment 1). Lysimeter 1-A (3964.3N, 7796.6E) has not yielded a sufficient aliquot of water for analysis. In accordance with the manufacturer's recommendation, the silica pack enveloping lysimeter 1-A will be re-wetted with deionized/distilled water. Clean water will be pumped into the lysimeter and the vessel will be pressurized to disperse water into the silica pack. This procedure will be attempted within the next two weeks.

Part IV.H.1. The soil monitoring program will be changed as requested to reflect the sampling locations of unimpacted soils for establishing background data. Background samples (prior to waste acceptance) shall be collected along the two ditches on either side of the paved entrance road, within 3 feet of the respective ditch bank that is <u>farthest</u> from the paved entrance road (Attachment 14-1). Soils along these banks are unimpacted soils inasmuch as these areas have not been associated with past waste hauling activities. Foreground samples (following waste acceptance) shall be collected along the two ditches on either side of the paved road entrance road, within 3 feet of the respective ditch bank that is <u>closest</u> to the paved entrance road (Attachment 14-1). A new map identifying the six core sample locations for both background and foreground monitoring is enclosed (Attachment 14-4).

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Should you have any questions or require additional information concerning this submittal, please contact David O'Connor of this Office at 313/322-0701.

Sincerely,

Jerome S. Amber Principal Staff Engineer

Stationary Source Environmental

Control Office 313/322-4646

DAO\

Attachments

cc: Honorable Gerald Richards, Mayor, Allen Park
Honorable Michael Guido, Mayor, Dearborn
Honorable Tom Coogan, Mayor, Melvindale
Ardys Bennett, City of Allen Park
Peter Quackenbush, MDNR - Lansing
Larry AuBuchon, MDNR - Northville
Steve Buda, MDNR - Lansing

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INTEROFFICE COMMUNICATION

April 11, 1990

TO:

Ben Okwumabua, Supervisor, Northville District

Waste Management Division

FROM:

Terry McNiel, Geotechnical Support Unit

Waste Management Division

SUBJECT:

Ford Allen Park Landfill

MID 980 568 711

Permit Monitoring Submittal

We are in receipt of the attached quarterly surface water monitoring results for the Ford Allen Park Landfill dated February 2, 1990. The following areas of noncompliance and concern are outlined:

- 1. The sampling occurred on November 16, 1989. Analytical results are shown to have been received by the facility on January 9, 1990. The data was submitted to MDNR on January 26, 1990. Please note that the submittal timeline is not in compliance with Part I, Condition E.9.c. of the facility's operating license, which states that "the licensee shall submit the results of all environmental monitoring required by this license to the Chief of the Waste Management Division within 60 days of sample collection or within 7 days of receipt of analytical results, whichever is sooner."
- 2. We have not received the annual leachate withdrawal volume data due on March 1, as required by Part IV, Condition B.2.b.
- 3. Leak detection lysimeters were installed February 8, 1990, as required by Part IV, Condition D.1. It appears that due to questionable drilling techniques, these monitoring devices may not be functional in the short-term and possibly long-term. Ford must submit documentation of drilling and installation techniques, plus a detailed schedule of corrective actions and sampling events for our review.
- 4. Numerous concerns relative to sampling and analysis are noted in the attached memo from Liz Browne.

The company should be given 30 days to address the above violations and comments.

If there are any questions with regard to this review, please contact me or Liz Browne.

Teny M. And

Attachment

cc: Ms. D. Montgomery

Ms. L. Browne

Mr. P. Quackenbush

C&E File

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NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON MARLÉNE J. FLUHARTY GORDON E. GUYER KERRY KAMMER O. STEWART MYERS DAVID D OLSON RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING P.O. BOX: 30028 LANSING, MI 48909

DAVID F. HALES, Director

February 6, 1989

Mr. David Miller Ford Motor Company P.O. Box 1699 Dearborn, Michigan 48121-1699

Dear Mr. Miller:

SUBJECT: Annual Groundwater Report MID 980 568 711 (Allen Park)

Your facility is listed as a Land Disposal Facility and as such is regulated under Michigan Act 64, P.A. 1979, as amended, and the Federal Resource Conservation and Recovery Act (RCRA) regulations. This letter is a reminder that the annual groundwater report required under 40 CFR 265.94(a)(2)ii-iii and 265.94(b)(2) for 1987 is due March 1, 1988. Please send the report to:

H.W. Geotechnical Support Unit Waste Management Division Michigan Department of Natural Resources P.O. Box 30241 Lansing, Michigan 48909

If it is your company's position that an annual report is not required, please respond with a letter stating the reason. The Waste Management Division will then confirm and update our files, or notify you if we need more information or disagree.

If there are any questions, please contact me.

Sincerely.

David Slayton

Waste Management Division

517-373-2730

cc: C & E File

De Montgomery/Geotech File

District Office

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MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

March 8, 1990

To: Terry McNiel, HW Geotech Unit, WMD

From: Liz Browne, WMD Env. Monitoring Coordinator

Subject: Ford Allen Park Clay Mine Landfill

MID 980 568 711

The Act 64 surface water quality data that was submitted to Mr. Alan Howard from Mr. Jerome Amber accompanying a February 2, 1990 cover letter has been reviewed, as requested. Many concerns were noted with the submittals and are as follows:

- 1. Many of the holding times and some detection limits were exceeded in this sample analysis. Copies of the pages with this problem have been attached, with the maximum holding time for the parameters in question indicated. Conversely, the data for the 10-11-89 BOD sample, requiring a 5 day incubation period, only took 2 days to run. It should be noted that the analysis of pH and specific conductivity are required within 15 minutes and 24 hours respectively. The samples from 11-08-89 did not even reach the laboratory within this time frame. These analysis should be determined in the field, at the time of sampling, and reported as such on the analytical report. This is currently being done for the Act 641 data at this facility.
- 2. An indication of the amount of rainfall associated with the sampling event has not been provided, as required by Part IV, condition E.1 of their Act 64 Operating License.
- 3. Some of the methodology references that were provided with the submittal do not agree with those in the attachment to the facility's operating license. If these other methods are preferred, the facility should send a letter requesting a change to their sampling and analysis plan to adopt these methods. The references in question are highlighted on the copy of the submittal that is attached to this memo.
- 4. There is an inconsistency between the method reported for the 11-08-89 DNR scan 8 data and the method reference. The title indicates that EPA 8040 was used, whereas the methodology noted is for EPA 600/4-82-057. Method 8040 is from EPA SW-846.

- 5. The request to review this data questioned the apparent contamination in surface water. As this is still in the background development stages, contamination determination for the inorganic parameters is immature at this time. This is due to the natural occurrence of many of these constituents in unimpacted surface water. More data will need to become available to adequately assess the condition of the surface water associated with this site. A further discussion of the organic data follows.
- Although the organic scan data indicates that all of the parameters for which analysis was done were not present above their respective detection limits, there is still a concern about this data. The 10-11-89 data for the DNR scan 8 parameters indicates a detection limit of >200 ug/l. The acceptable limit for this scan varies between 10-20 ug/l, depending upon the constituent. The submittal indicates that the elevated limits were due to sample matrix interference. Further explanation is needed to address this situation. As this is a relatively 'clean' water sample, matrix interference is not expected. Additionally, the use of such inflated data will result in skewed data for the background determination, impacting the effectiveness of the statistical test to be applied for detection monitoring purposes. It is recommended that the problem associated with this analysis be determined, and that a sample with more acceptable detection limits be substituted for background development purposes.
- 7. The quality control information for the organic scans is inadequate, the data for the 11-08-89 DNR Scan 7 is missing completely. At a minimum, the sample replicate and spike data should be available. This is true, even if the qc data does not necessarily represent Ford's samples. The data from that batch should be made available. This is especially important considering the concerns with the data as outlined in item 6, above.

This concludes the review of the referenced submittal. In summary, many concerns were noted that represent both long and short term impacts. The facility should determine the actual laboratory analytical methods to be used for their samples, and submit a letter requesting an update to their sampling and analysis plan if necessary. Closer attention should be paid to the maximum holding times for all parameters, as many were exceeded. pH and specific conductivity should be field analyzed, and reported as such in the analytical report. Better qc documentation should be supplied for the organic parameters, and the sample matrix interference problem associated with the scan 8 analysis should be determined and rectified. Additionally, a more applicable set of data, with lower detection limits should be provided to replace the scan 8 10-11-89 data.

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Please let me know if you have any questions regarding the contents of this memo, or the attachments indicating the areas of concern.

cc: Ms. D. Montgomery C & E File

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MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

December 18, 1987

To:

Pete Quackenbush, HW Permit Engineer, WMD

From:

Liz Browne, He Environmental Monitoring Coordinator

Subject:

Ford Motor Co., Allen Park Clay Mine

MID 980 568 711

I have reviewed the facility response of June 10, 1987 to your April 28, 1987 application review. Many of the comments have been adequately addressed, however, some major concerns still exist.

ENVIRONMENTAL MONITORING PROGRAM

SURFACE WATER PROGRAM

A single monitoring point at the sediment pond outflow has been proposed for surface water. Again, as with the first review, this is inadequate. Stations need to be established around the perimeter of the hazardous waste cells. These points should also be included on a site map. As submitted currently, any increase could not be traced to specific site operations. The sediment pond receives a large contribution from the solid waste portion of the site, as well as the hazardous waste operations. The outfall point should also be maintained to ensure that the pond effluent quality is acceptable.

The proposed statistical program is unacceptable. No indication of the time frame for "sufficient baseline data" to be gathered has been made. Since replicate sampling has not been proposed, it could take three to four years for a baseline to be established. It is unclear how background will be established under this program. No upstream or unimpacted point has been identified. If each point is to be compared to itself, where does the background period end and detection monitoring begin? As proposed, two tests need to be failed prior to additional sampling. Failure of one test should be sufficient to trigger action. The only action currently proposed requires the taking of four replicate samples. It needs to be stated that if a replicate sample

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also exceeds established background, action must be taken to determine the cause of the increase (and/or pH decrease). A schedule to submit a corrective action plan will need to be included.

Two suggested statistical tests are attached. The sign test is acceptable for inorganic data. For organic data, especially where levels are at or near the detection limit, the Cochran's Approximation to the Behrens-Fisher Student test with Continuity Correction is recommended. Again, any proposed test should include actions to be taken should a constituent trigger.

SEDIMENT PROGRAM

A single composite sample from four individual core samples is insufficient. Compositing samples, especially when only one analysis results, does not supply adequate information. This is especially true in a sedimentation basin where differential settling is expected to occur. Individual samples should be analyzed, and the resultant data report should include a map indicating the sample points. It should be noted that if levels of contaminants exist which may create a hazard to human health or the environment, the facility shall remove and properly dispose of the contaminated material.

LEACHATE PROGRAM

The sampling point identified for the leachate monitoring is confusing. Since the storage tank occurs after the leachate from cells I and II combine, how will representative samples from each cell be obtained? Samples should be collected and analyzed from the individual cells. Additionally, a deionized water rinse may not be adequate for the leachate sampler. A wash with a laboratory grade soap should precede the rinse. This will offset the chance of either crosscontamination or contaminant carry over between sampling events.

As with the surface water, a few problems exist with the proposed statistics. Again, the use of two statistical tests to trigger action is excessive. Use of the UCL at the two standard deviation level is sufficient. Also, the lack of a specific background period is unacceptable. Background leachate data should already exist that can be used for the setting of UCLs. If not, replicate sampling should be undertaken to quickly increase the data base. Adding the constituent in question to the other sampling matrices is appropriate if a replicate sample confirms that the UCL has been exceeded.

AIR MONITORING

As usual, Air Quality Division should review this program.

SOIL MONITORING

Composite sampling, as proposed for the road shoulders will not supply adequate information. As explained in SW-846, third edition, composite samples are only appropriate if a sufficient number are taken. Two samples from the entire distance between the truck wheel wash and Oakwood Blvd. may not adequately represent this area. A site map indicating the actual sampling points should accompany the resultant data.

As with the sediment basin, if levels of contaminants exist which may create a hazard to human health or the environment, the facility shall remove and properly dispose of the soil. Measures will also need to be instituted that would prevent this deposition of contaminants on the haul road in the future.

LEAK DETECTION PROGRAM

The clean-out sumps for the leak detection system should be checked monthly. The amount of liquid withdrawn should be recorded, and analysis run if sufficient sample volume is found. As with the leachate sampling, very careful decontamination of the FVC bailer should be undertaken. A deionized water rinse may not be adequate.

A method to statistically evaluate the resultant data is needed. This should include the statistical test(s) employed. Also, a method to determine background, and a time frame in which it will be established is needed. Actions to be taken if a statistical limit is exceeded also need to be provided.

POTENTIOMETER PROGRAM

Assuming that the wells chosen for this purpose are adequate, as determined by Terry McNiel, the information supplied in this section is acceptable.

GENERAL COMMENTS

A few concerns still exist in relation to the analytical lab. Although it is inferred from the field sheets that have been included, Burmah has not been specifically identified as the company contracted to perform field and laboratory work. The qa/qc plan has been outlined in each sample matrix, however, a copy of the actual plan has not been included. At least one copy for Waste Management Division files should be supplied. Also, a copy should be available on site at all

times. Should a new laboratory be used in the future, split sampling should be undertaken to assure that similar sample results will be obtained. An appropriate qa/qc program and new sampling and analysis plan should also be provided.

Additional parameters need to be added to the various sample matrices due to their being identified in the list of acceptable waste codes, or their use in geochemical models for site trend analysis:

Surface Water

sodium, nickel and hexavalent chromium

Sediment

nickel

Leachate

cyanide, nickel, and hexavalent chromium

Air - Determined by AQD

Soil

nickel

Leak Detection

sodium, calcium, magnesium, iron, chloride, bicarbonate, carbonate, carbonate and sulfate (these should be collected after those parameters already identified in Exhibit F, page 473.1 if sample volume is restrictive)

This concludes my review of the new application. Please let me know if you have any questions or concerns about any of the items identified in this memo.

cc: Mr. T. McNiel

Ms. D. Montgomery

Ms. M. Sabadaszka, US EPA-Region V 🗸

Geotech File

Ford Allen Park Op. Lic. Re Appl File

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ATTACHMENT 15 STATISTICAL PROCEDURE

Two statistical tests will be used to determine if the concentrations of hazardous waste constituents exceed their respective background in a given monitoring well or sump. The sign-test will be used to determine if there is an increase in the concentrations of a significant number of parameters, independent of the magnitude of the changes. The t-test with Continuity Correction will be used to detect a significant increase in the concentration of any individual parameters. This attachment describes the sign-test, the t-test with Continuity Correction, and then the application of these tests at the Salzburg Landfill.

A. The Sign-Test

The sign-test does not assume any particular distribution for the parameter data. Any data below the limit of quantification will be treated as having a value of one-half the limit of quantification. Starting with the first sampling period, a comparison is made for each parameter between the mean of its background values and the mean of its foreground values. If the mean of the foreground values is greater than the mean of the background values, a plus (+) is assigned to that measurement data. If the mean of the foreground values is less than the mean of the background values, a minus (-) is assigned. A zero (0) is assigned for equivalent means.

The hypothesis tested is the null hypothesis, $\rm H_{0}$, that background values are greater than or equal to foreground values, against the alternative hypothesis, $\rm H_{1}$, that the foreground values are greater than background values. The test statistic for this test is:

T = total number of pluses

Large values of T indicate that a plus is more probable than a minus, as stated by the alternative hypothesis. The critical region corresponds to a value of T greater than or equal to (n-t), where n is the total amount

of pluses and minuses. The term t is found from Table 1 by entering the table at n and finding the largest tabled value of alpha that is less than or equal to the significance (0.05 in this case). The value of y corresponding to alpha is t.

In the case where there are no table entries, alpha, which are less than or equal to the significance (0.05 in this case), it is necessary to set t = -1; the RCRA Permit Writer's Manual describes this situation thusly:

"At a level of significance of 0.05, this test requires that five sample events be compared before the test is appropriate (before trends can be deduced)." 1

The procedure is concluded by comparing the quantity T with the quantity n-t. If T is greater or equal to n-t, the null hypothesis, H_0 , is rejected and the alternate hypothesis, H_1 , accepted, establishing significance. On the other hand, when T is less than n-t, the null hypothesis H_0 is maintained and no significance is demonstrated.

The <u>RCRA Permit Writer's Manual</u> describes the sign-test as "well-known". ² Indeed, the sign-test is described in many statistics texts. The <u>RCRA Permit Writer's Manual</u>, for example, mentions ³ Conover (1971) ⁴. A treatment of the sign-test may also be found in Siegel ⁵.

The basic concept behind the sign test is the reduction of two sets of continuous data (i.e., the background and foreground observations) to one set of dichotomous data (i.e., the set of pluses and minuses), and the subsequent application of the binomial test to the dichotomous data set.

This approach is noted for its great power. Siegel writes about the power of this approach, the application of the binomial test to continuous data that have been dichotomized:

"...if the data are basically dichotomous, even though the variable has an underlying continuous distribution, the binomial test may have no more powerful alternative."

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 $\frac{\text{TABLE 1}}{\text{BINOMIAL DISTRIBUTION}}$ $\text{Alpha = P[X \le y] for b(X; n, 0.50)}$

n	<u>y</u>	Alpha	<u>n</u>	<u>y</u>	Alpha	n	<u>y</u>	Alpha	<u>n</u>	<u>y</u>	Alpha
1 1	0 1	0.5000 1.0000	8 8	0 1	0.0039 0.0352 0.1445	12 12 12	0	0.0002 0.0032 0.0193	15 15 15	0 1	0.0000 0.0005 0.0037
2 2 2	0 1 2-	0.2500 0.7500 1.0000	8888888888	0 1 2 3 4 5 6 7 8	0.3633 0.6367 0.8555 0.9648	12 12 12 12	2 3 4 5 6 7	0.0730 0.1938 0.3872 0.6128	15 15 15 15	2 3 4 5 6	0.0176 0.0592 0.1509 0.3036
3 3 3 3	0 1 2 3	0.1250 0.5000 0.8750		•	0.9961	12 12 12	8 · 9	0.8062 0.9270 0.9807	15 15 15	7 8 9	0.5000 0.6964 0.8491
3 4 4	3 0 1	0.0625 0.3125	9 9	0 1 2 3 4	0.0028 0.0195 0.0898 0.2539	12 12 12	10 11 12	0.9968 0.9998 1.0000	15 15 15 15	10 11 12 13	0.9408 0.9824 0.9963 0.9995
4 4 4	2 3 4	0.6875 0.9375 1.0000	999999999	5 6 7	0.5000 0.7461 0.9102	13 . 13 13	0 1 2	0.0001 0.0017 0.0112	15 15 15	14 15	1.0000
5 5 5 5 5 5	0 1 2 3	0.0313 0.1875 0.5000 0.8125	9 9	8 9 0	0.9805 0.9980 1.0000	13 13 13 13	2 3 4 5 6 7	0.0461 0.1334 0.2905 0.5000			
	4 5	0.9687 1.0000	10 10 10	1 2 3 4 5	0.0107 0.0547 0.1719	13 13 13	8 9 10	0.8666 0.9539 0.9888			
6 6 6	0 1 2 3	0.0156 0.1094 0.3437 0.6562	10 10 10 10	4 5 6 7	0.3770 0.6230 0.8281 0.9453	13 13 13	11 12 13	0.9983 0.9999 1.0000			
6 6 6	4 5 6	0.8906 0.9844 1.0000	10 10 10	8 9 10	0.9893 0.9990 1.0000	14 14 14	0 1 2 3 4	0.0001 0.0009 0.0065		·	
7 7 7 7 7 7	0 1 2 3 4 5 6 7	0.0078 0.0625 0.2266 0.5000 0.7734 0.9375 0.9922 1.0000	11 11 11 11 11 11 11	0123456789	0.0005 0.0059 0.0327 0.1133 0.2744 0.5000 0.7256 0.8867 0.9673 0.9941	14 14 14 14 14 14 14	5 6 7 8 9 10 11 12 13	0.0287 0.0898 0.2120 0.3953 0.6047 0.7880 0.9102 0.9713 0.9935 0.9991			
,			11 11	10 11	0.9995 1.0000	14	14	1.0000	,		

B. The t-Test with Continuity Correction

Statistical Concept: This section describes the application of Continuity Correction to Cochran's Approximation to the Behrens-Fisher Student's t-test (i.e., the RCRA t-test, or "Basic Statistical Procedure") in order to correct several of the difficulties with the RCRA version. Continuity Correction, to some extent, alleviates the following difficulties with the t-test:

- 1. Parameters at or near detection limit.
- Data too discrete.
- Observations nearly constant

Continuity Correction does not alleviate the other difficulties associated with mis-application of the t-test:

- 4. Mis-representative variance (i.e., observations not independent)
- 5. Imbalance between risk of false positives and failure to detect changes that are actually present (caused by too many applications of the test).
- 6. Inappropriateness of the t-test when there are only very small numbers of observations.

Although the employment of Continuity Correction does not provide relief from Problems 4, 5 and 6, the circumstances of data collection and application of the t-test partially mollify problems 4 and 5. The problem of the lack of independent observations still exists when four samples are taken from the same well in resampling. The use of the t-test in limited situations, rather than as an initial exploratory tool, mitigates problem 5.

We will use Cochran's Approximation to the Behrens-Fisher Student's t-test (i.e., the RCRA t-test, or "Basic Statistical Procedure") with two adjustments for continuity:

1. The variance, s², of each data set will be computed in a manner that takes into account the fact that each data point represents a range of possible values rather than a single precisely determined real number.

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2. The standard error of the mean (used in the denominator of the equation for the t-statistic) acts as an indicator of the precision with which the mean of a data set has been determined. A lower limit to the standard error of the mean will be used to prevent it from decreasing beyond the precision of the analytical precision, thus inflating the t-statistic.

Continuity Correction is appropriate when data observations do not represent precisely determined real numbers but a range of possible values. Suppose, for example, that the laboratory test for a chemical parameter has a limit of quantification of 30 units and that the test is able to generate results with a precision of 10 units. The test has a discrete set of possible outcomes:

```
<30 units (i.e., below limit of quantification)
30 units (i.e., at limit of quantification)
40 units
50 units
60 units
etc.</pre>
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Each of these outcomes does not represent a specific point on the real number line but rather a range of possible values established by the laboratory techniques and instrumentation. The outcome "<30 units" indicates any value from 0 units up to 30 units. The outcome 50 units indicates any value from 45 units to 55 units. The outcome 30 units probably indicates any value from 25 to 35 units. Each of these outcomes thus represents a range of possible values.

Continuity Correction involves doing computations in a way that acknowledges that the data represent ranges on the real number lines, not specific points.

The t-test requires the calculation of the mean of each of two sets of data (the background set and the foreground set). The mean = $(x_1 + ... + x_n)/n$. If we regard each x_i as representing a range, in finding the mean using this formula we should use the midpoint of the range for x_i . For

example, if the limit of quantification is 30 units, an observation of "<30 units" would be treated as 15 units in calculating the mean.

The t-test also requires the calculation of the variance of each of the two data sets. The equation for the variance is

$$s^2 = \frac{1}{n-1} \sum_{i=1}^{n} (x_i - \overline{x})^2$$

Each of the terms of the summation has the form $(x_i - \overline{x})^2$. To apply Continuity Correction it is necessary to treat each observation as representing a range of values from $x_i - \Delta_i$ through $x_i + \Delta_i$, and compute each term of the form $(x_i - \overline{x})^2$ as the mean of all possible values that would result if x_i were replaced by each real number from $x_i - \Delta_i$ up to $x_i + \Delta_i$.

Specifically, instead of $(x_i - \bar{x})^2$, we use

$$\frac{1}{2\Delta} \begin{cases} x_i + \Delta_i \\ (u - \overline{x})^2 du. \end{cases}$$

This expression simplifies, through calculation of the integral, to

$$(x_i - \bar{x})^2 + (1/3) \Delta_i^2$$

Using this expression in the place of $(x_i - \overline{x})^2$ gives us a modified equation for the variance

$$s^2 = \frac{1}{n-1} \sum_{j=1}^{n} (x_j - \bar{x})^2 + (1/3) \Delta_j^2$$

In the example considered earlier, where the limit of quantification was 30 units and values above 30 units were obtained to the closest 10-unit level, we would treat an observation "<30 units" as having $x_i = 15$ and $\Delta_i = 15$. An observation of "30 units" would be treated as having $x_i = 30$ and $\Delta_i = 5$. An observation of "40 units" would be treated as having $x_i = 40$, $\Delta_i = 5$.

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The expression for the variance s² has a very natural interpretation. The numerator of the expression, i.e.,

$$\sum_{i=1}^{n} \left[(x_i - \bar{x})^2 + (1/3) \Delta_i^2 \right]$$

represents the sum of the second moments of the various observations about the mean. Each of the summands,

$$(x_i - \bar{x})^2 + (1/3)\Delta_i^2,$$

consists of two terms:

- a. The quantity $(1/3) \Delta_i^2$ is the second moment of the uniformly distributed range of points from $x_i \Delta_i$ up to $x_j + \Delta_i$ about its mean x_i .
- b. The quantity $(x_i \bar{x})^2$ represents the contribution made by observation x_i to the second moment about x if the observation were concentrated at the single point x_i .

That the expression $(x_i - \overline{x})^2 + (1/3) \Delta_i^2$ gives the second moment of the range of values from $x_i - \Delta_i$ through $x_i + \Delta_i$ about \overline{x} is the consequence of the theorem that the second moment of a set of points about an arbitrary real number is equal to the sum of (1) the second moments of the points about their own mean and (2) the second moment the points would have about the real number if the set of points concentrated into a single point located at their mean.

The t-test requires calculation of the t-statistic

$$t* = (\bar{x}_m - \bar{x}_b) / (s_m^2/n_m + s_b^2/n_b)^{0.5},$$

Where:

 n_m = the number of foreground observations,

n_b = the number of background observations,

 \overline{X}_m = the mean of the foreground observations,

 \overline{x}_h = the mean of the background observations,

 s_m^2 = the variance of the foreground observations, and

 s_{b}^{2} = the variance of the background observations.

In this equation for t*, the numerator is the difference between the means of the two data sets. The size of the difference is evaluated in terms of the denominator, which is the standard error of the difference of the two means. This standard error of the difference of the means is computed as the square root of the sum of the squares of the standard errors of each of the two means. The standard error expressions are:

$$s_m/\sqrt{n_m}$$
 = the standard error of the foreground mean, and $s_b/\sqrt{n_b}$ = the standard error of the background mean.

The standard error quantities are intended as indicators of how precisely each mean has been established. As a general rule of thumb, we would expect that there is a probability of about 95% that the true mean (i.e., the mean of the population from which the sample was drawn) differs from the sample mean by less than two standard errors.

The square of the standard error of the estimator of the mean may be called the "variance of the mean". Thus:

$$W_{\rm m} = s_{\rm m}^2/n_{\rm m} =$$
 the variance of the foreground mean, and $W_{\rm b} = s_{\rm b}^2/n_{\rm b} =$ the variance of the background mean.

Suppose in the example described above, where the limit of detection was 30 units, that one data set consisted of a series of identical observations "<30 units". In this situation, the precision with which the mean is determined is not increased by having a great number of observations. No matter how many observations of "<30 units" we have, all we know about the mean is that it probably lies between 0 units and 30 units. It would be appropriate in this situation to regard the mean, $\bar{\mathbf{x}}$, as 15 units (i.e., one-half the limit of quantification), and to regard the standard error of the mean as 7.5 units (i.e., one quarter the limit of quantification, or one-half of $\Delta_{\mathbf{i}}$). To say that the true mean (i.e., the mean of the population from which the sample was drawn) lies between 0 units and 30 units would then be equivalent to saying that it lies within two standard errors of the sample mean, $\bar{\mathbf{x}}$.

Suppose, again as in the example described above, that the precision of the analytical procedure was 10 units, so that 30 units, 40 units, 50 units, etc., were the possible observed values. Suppose that one data set consisted entirely of observations of "50 units". No matter how many observations of "50 units" we have, all we know about the mean is that it probably lies between 45 units and 55 units. It would be appropriate in this situation to regard the mean, \overline{x} , as 50 units and to regard the standard error of the mean as 2.5 units (i.e., one-quarter of the precision, or one-half of Δ_i). To say that the true mean (i.e., the mean of the population from which the sample was drawn) lies between 45 units and 55 units would then be equivalent to saying that it lies within two standard errors of the sample mean \overline{x} .

For each of the two data sets, when the variance of the mean is computed, care should be taken that its square root, the standard error of the mean, is not less than precision of the analytical procedure is able to establish.

Specifically, a Lower Limit for the Variance of the Mean (LLVOM) should be computed:

LLVOM =
$$\frac{1}{n} \sum_{i=1}^{n} \left[\frac{\Delta i}{2} \right]$$
, where

 \triangle_i = one half the limit of quantification if the observation x_i is below the limit of quantification, or one-half the precision of the analytical procedure otherwise.

If the variance of the mean $(W = s^2/n)$ is less than LLVOM, it should be replaced by the quantity LLVOM.

In the case where all the observations of a data set are below the level of quantification, the standard error of the mean will thus be treated as one quarter of the limit of quantification. In the case where all the observations of a data set are at a constant value at or above the level

of quantification, the standard error of the mean will thus be treated as one quarter of the precision.

Statistical Procedure: The null hypothesis, ${\rm H_0}$, to be tested states that the background mean is greater than or equal to the foreground mean. The alternate hypothesis, ${\rm H_1}$, states that the foreground mean exceeds the background mean.

In general, when an observation is below the minimum detection limit (MDL), we will use $x_i = MDL/2$ and $\Delta_i = MDL/2$. If an observation is at or above the level of quantification, we will set $x_i =$ the observed value and

 Δ_i = one-half the difference between the next possible higher observed value and x_i (determined by the analytical process and instrumentation).

The mean of a set of values x_1, \ldots, x_n will be computed by $\overline{x} = (x_1 + \dots + x_n)/n$ and the variance s^2 will be computed by:

$$s^2 = \frac{1}{n-1} \sum_{i=1}^{n} \left[(x_i - \bar{x})^2 + (1/3) \Delta_i^2 \right]$$

The variance of the mean, W, will be computed as s^2/n . W will be compared with the quantity

$$LLVOM = \frac{1}{n} \sum_{i=1}^{n} \left[\frac{\triangle_i}{2} \right] 2$$

If the computed W is less than LLVOM it will be replaced by LLVOM.

Except for these modifications, the RCRA t-test computational procedure will be unchanged. After the mean and variance have been computed as described, the Cochran's Approximation to the Behrens-Fisher Student's t-test will be used.

Let n_b = the number of background observations and n_m = the number of foreground observations. From the background and foreground data calculate the background mean, \overline{x}_b , the foreground mean, \overline{x}_m , the background variance, s_b^2 , the foreground variance, s_m^2 , the variance of the estimator

of the background mean, W_b , and the variance of the estimator of the foreground mean, W_m . From this information, the t-statistic is computed as:

$$t* = \sqrt{\frac{x_m - x_b}{W_m + W_b}}$$

Calculation of the comparison t-statistic (t_c) against which t* will be compared necessitates first computing t_b and t_m from standard one-tailed tables where

t_b = value of t from t-table with n_b - 1 degree of freedom and confidence level 0.05;

 t_m = value of t from t-table with n_m - 1 degree of freedom and confidence level 0.05.

A copy of the appropriate t-table is included here as Table 2. The comparison t-statistic $t_{\rm c}$ is:

$$t_{c} = \frac{W_{b}t_{b} + W_{m}t_{m}}{W_{b} + W_{M}}$$

The t-statistic, t^* , is now compared with the comparison t-statistic, t_c , using the following decision rule:

If t^* is greater than or equal to $t_{\rm C}$ then the null hypothesis, ${\rm H}_{\rm O}$, is rejected, ${\rm H}_{\rm I}$ is accepted, and the foreground mean is found to be greater than the background mean.

However, if t^* is less than t_c then the foreground mean is not found to exceed the background mean and the null hypothesis, H_0 , is maintained.

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TABLE 2
t-TABLE FOR PROPOSED STATISTICAL TEST

Degress of Freedom	t for <u>Alpha = 0.05</u>
1	6.314
2	2.920
3	2.353
4	2.132
5	2.015
6	1.943
7	1.895
8	1.860
9	1.833
10	1.812
11	1.796
12	1.782
13	1.771
14	1.761
15	1.753
16	1.746
17	1.740
18	1.734
19	1.729
20	1.725
21	1.721
22	.1.717
23	1.714
24	1.711
25	1.708
26	1.706
27	1.703
28	1.701
29	1.699
30	1.697
40	1.684
60	1.671
120	1.658
Infinity	1.645

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NAME OF PERSON DOCUMENTING CONVERSATION SIGNATURE	. / 192	1 -	-21 -8 -6	
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Steel Division Ford Motor Company 3001 Miller Road Dearborn, Michigan 48121

January 26, 1983

U. S. Environmental Protection Agency Waste Management Division 230 South Dearborn Street Chicago, II, 60604

Attention: Technical, Permits and Compliance

Section -- 5HW-TUB

Re:

Letter of Warning

Company Name: Ford Motor Company -- Allen Park Clay Mine

Oakwood Blvd. and Southfield

Allen Park, Michigan

EPA I.D. No.: MIT 2070010093 (Superseded by MID 980568711)

As requested by Mr. William H. Miner in his letter dated January 10, 1983, the results of the fourth quarterly sampling analysis for the subject facility are attached. The results indicate apparent exceedance of the USEPA Interim Drinking Water Standards for lead in the upgradient well #5-D, (.091 mg./1). The slight exceedance of coliform bacteria in wells 5-D, 103-D and 104-D are attributed to sample equipment rinsed with distilled water analyzed to show the presence of coliform bacteria. Please be advised also that this submittal is being made within fifteen (15) days after receipt of the analysis. Although sampling of the wells was performed on October 26, 1982, complete analyses were delayed due to questionable results obtained by our outside laboratory and the need for confirmatory work.

With respect to identification of parameter values whose concentrations exceeded maximum levels listed in Appendix III for each well, the attached letter to the EPA Regional Administrator dated July 13, 1982 covering the second quarterly report provided the required information. The third quarter sampling period results indicate well 104-D had a coliform bacteria level of 8 colonies/100 ml which is in excess of levels listed in Appendix III.

		4 - 1

U. S. Environmental Protection Agency January 26, 1983 Page 2

Enclosed for your information, please find a <u>Demonstration</u> for <u>Exemption of Subpart F Requirements</u>. This exemption has been implemented pursuant to the provisions of 40 CFR 265.90 (c). Accordingly, there will be no further groundwater analyses conducted.

Very truly yours,

Ben C. Trethewey, Manager Mining Properties Department

DSM:dp

Enclosures

cc: Mr. A. Howard - Michigan Department of Natural Resources

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CERTIFIED WILL RETURN RECEIPT RECOUNTED

8.C. Tretheway, Manager Ford Amtor Company-Allen Park Clay Mine 3001 Miller Road Room 2042 Dearborn, Michigan 40121

RE: Letter of Warming

Company Fase: Ford Motor Company-

Allen Park Clay Hine

Location: Oakstood Sive. I South Field

Allen Park, Hiditore

EPA TO #: MITEPOOLOGYS

Near dr. Tretheway:

Notice is hereby given that the United States Environmental Protection Agency (U.S. EPA) has determined that the above facility is in violation of requirements of Subtitle C of the Resource Conservation and Recovery Act of 1976, as seended (RCRA). Specifically, it has been determined that Ford Motor Co.-Allen Park Clay Mins is in violation of Section 2004 of RCRA (42 880 6924).

The groundwater monitoring reports that your facility submitted to U.S. EPA have been reviewed pursuant to the requirements of 40 CFR Part 265 Subpart F. This review has identified the following areas of neo-compliance:

The results of the fourth quarterly sampling analysis were not reported to the Regional Administrator. Also, Values of parameters whose concentrations exceeded maximum levels listed in Appendix III have not been saparately identified for each well for the second and the third quarterly reports [40 CFR 265.84(a) [2](i)].

You are hereby requested to provide documentation to this office, within 15 days after receipt of this letter, informing us of action taken to correct these violations and/or to prevent future violations. Such documentation should include a time frame for bringing your facility into compliance with Part 265 Subpart F. Please address such documentation to:

U.S. Environmental Protection Agency Vasto Management Division 230 South Dearborn Street Chicago, Illinois 50004. Attn: Technical, Permits and Compliance Section

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CERTIFIED WAIL

8.C. Tretheway, Manager Ford Mator Company-Allen Park Clay Mine 3001 Miller Road Room 2042 Dearborn, Michigan 48121

RE: Letter of Warming

Company Name: Ford Motor Company-

Allen Park Clay Fitce

location: Dakwood Blvd, & South Field

Allen Park, Michigan

EPA ID #: MITE/ROIDERS

Peer Br. Trethewey:

Notice is hereby given that the United States Environmental Protection Agency (U.S. EPA) has determined that the above facility is in violation of requirements of Subtitle C of the Resource Conservation and Recovery Act of 1976, as assended (RCRA). Specifically, it has been determined that ford Motor Co.-Allen Park Clay Nine is in violation of Section 2004 of RCRA (42 USC 6924).

The groundwater monitoring reports that your facility submitted to U.S. EPA have been reviewed pursuant to the requirements of 40 CFR Part 265 Subpart F. This review has identified the following areas of non-compliance:

The results of the fourth querterly sampling analysis were not reported to the Regional Administrator. Also, Values of parameters whose concentrations exceeded maximum levels listed in Appendix III have not been separately identified for each well for the second and the third quarterly reports [40 CFR 265.94(a) [2](i)].

You are hereby requested to provide documentation to this office, within 15 days after receipt of this letter, informing us of action taken to correct these violations and/or to provent future violations. Such documentation should include a time frame for bringing your facility into compliance with Part 265 Subpart F. Please address such documentation to:

U.S. Environmental Protection Agency Waste Management Division 23D South Dearbern Street Chicago, Illineis 50504. Atto: Technical, Permits and Compliance Section A copy of this information should also be sent to:

Michigan Department of Natural Resources Alan J. Howard, Chief Office of Hazardous Materials Control P.C. Box 30038 Lansing, Michigan 48909

This notice only addresses our findings regarding your facility's compliance with certain reporting requirements of 40 CFR 265.90-94. Other RCRA violations which may be surfaced as a result of an inspection will be addressed at that time.

Please contact Mr. James Brossman of my staff at (312) 886-3785, if you have any questions.

Very truly yours,

William H. Miner, Chief Technical, Permits and Compliance Section

cc: Alan J. Howard, MORR

bcc: Constantelos Klepitsch ORC Jodi Traub Joe Boyle

1.	part 2	Sthis facility currently not subject to 40 C.F.R. 64/265 Subpart F (or state equivalent) dwater monitoring requirements? (Check one.) No regulated land disposal units are located at the facility All hazardous waste and waste residues were removed from regulated land disposal units at the facility during the closure process in	6.	How many of the required systems identified in question 4 can immediately detect if any release has occurred from a waste management area to the uppermost aquifer? (If none, please write in zero "0".)
	 3. ☒ 4. ☐ 	accordance with EPA standards Groundwater requirements have been waived for all regulated units at the facility	7.	How many of the required systems identified in question 4 are adequate to determine the rate, extent of migration, and the concentration of hazardous wastes in the groundwater? (If none, please write in zero "0".)
ar ya	How i	If you answered question 3, skip to section V, rn questionnaire in envelope provided. Thank many 40 C.F.R. part 265/264 Subpart F (or state alent) groundwater monitoring systems are atly required at the facility?		Have any consent decrees been issued for this facility which relieve the owner/operator from complying with any Subpart F requirements contained in 40 CFR part 265/264 (or state equivalent)? (Check one.) 1. Yes please explain in the space provided below
5.	questi	many of the required systems you identified in on 4 have no groundwater monitoring wells in ? (If none, please write in zero "0".)		2. 🗆 No
			9.	Has this facility been notified in writing by either EPA or the state of any groundwater violations that were detected since October 1, 1989? (Check one.) 1. Yes
				2. ☐ No

	•
10. Based on your knowledge of this facility, what was the general nature of the groundwater violations identified in question 9? (Check all that apply.)	12. What were the total number of outstanding Class I groundwater monitoring violations cited at this facility as of September 30, 1993?
1. Inadequate number or placement of wells	· · · · · · · · · · · · · · · · · · ·
2. Damage or deterioration to a well	 -
 Sampling and analysis violation (e.g., failure to collect samples and/or failure to follow sampling & analysis procedures) 	13. How long has this facility been out of compliance?
4. Record keeping violations	(Check one.)
5. Failure to submit or report groundwater	1. Less than 1 year
monitoring information to the appropriate state or federal authority	2. 1 to 5 years
6. Improper well design and/or construction	3. 6 to 10 years
7. Failure to appropriately respond to detection of a release	4. More than 10 years
8. Inadequate characterization of the upper most aquifer	14. What are the primary reasons this facility has not complied with EPA's (or state equivalent)
9. Violation of a consent decree	groundwater monitoring regulations? (Check all that apply.)
10. Other (please explain)	1. Recalcitrance
	2. Complex hydrogeological conditions
	3. Technological problems
	4. Disagreement over technical/administrative requirements
Note: Please use the facility file and the following	5. Lack of owner/operator funds
definition of Class I violations to answer questions 11 and 12.	 Limited federal/state funds do not allow for timely oversight of facility progress
Definition of Class I Violations: A deviation from regulations, compliance orders, or permits which could	 Legal reasons (e.g., enforcement order has been appealed)
result in a failure to: assure hazardous waste is destined for and delivered to authorized treatment, storage and	8. Other (please explain)
disposal facilities; prevent releases; assure early detection of releases; or perform corrective action for releases.	· · · · · · · · · · · · · · · · · · ·
11. As of September 30, 1993, were there any	
outstanding Class I groundwater monitoring	
violations at this facility? (Check one.)	15. Is this facility on schedule to return to compliance?
1. Tyes	(Check one.)
2. ☐ No———— skip to question 17	1. Yes
	2. 🗆 No

				* · · · · · · · · · · · · · · · · · · ·
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16. In your opinion, what is the likelihood that this facility will comply with EPA's (or state equivalent) groundwater monitoring regulations? (Check one.)	20. In your opinion, what is this facility's potential to adversely effect human health or the environment (e.g., contaminate underground sources of drinking
1. Very likely	water or harm vegetation) as a result of a release from a regulated unit? (Check one.)
2. Somewhat likely	
3. As likely as unlikely	 Not applicable, release occurred from only unregulated unit(s)
4. Somewhat unlikely	2. Low potential
5. Very unlikely	3. Medium potential
6. Don't know	4. High potential
	5. Don't know
SECTION III: ENVIRONMENTAL IMPACT	-
Note: The questions in this section refer to both regulated and unregulated units. Regulated units are defined in 40 C.F.R. part 264.90 as surface impoundments, waste piles, land treatment units, and landfills which received hazardous waste after July 26, 1982. Unregulated units are those units that ceased receiving hazardous waste prior to July 26,	 21. In your opinion, what is this facility's potential to adversely effect human health or the environment (e.g., contaminate underground sources of drinking water or harm vegetation) as a result of a release from a unregulated unit? (Check one.) 1. \(\subseteq \) Not applicable, release occurred from only regulated unit(s)
1982.	2. Low potential
17. Has there been any release(s) to the groundwater at	3. Medium potential
this facility? (Check one.)	4. High potential
1. Tes	5. Don't know
2. \square No	
3. \square Don't know————————————————————————————————————	SECTION IV: CORRECTIVE ACTION
18. If you answered "yes" to question 17, has the release(s) spread off site? (Check one.)1. Yes	22. Has corrective action been initiated at this facility? Corrective action refers to actions taken to remove and/or treat hazardous constituents to prevent further groundwater contamination. (Check one.)
2. No	
3. Don't know	1. Yes
5. Don't know	2. ☐ No
19. What type of unit(s) did the release(s) occur from? (Check one.)	3. Don't know
1. Regulated unit(s)	
2. Unregulated solid waste management unit(s)	
3. Both regulated and unregulated unit(s)	
4. Don't know	

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SECTION V: CONCLUDING INFORMATION

If you have any additional comments or information you would like to provide us, please do so in the space below.

The Ford Allen Park Clay Mine is a hazardous waste disposal landfill licensed under the State's Hazardous Waste Management Act, 1979 P.A. 64, as amended. In 1987, The Michigan Department of Natural Resources (MDNR) issued the facility a waiver from monitoring the groundwater because the facility demonstrated that there is no potential for contaminants to migrate downward and impact underlying aquifers. The base of the Allen Park Clay Mine landfill has been constructed using a double liner system with a leak detection system in between. A substantial thickness of natural clay separates the bottom of the landfill from underlying aquifers. The aquifer underlying the site is confined and exhibits an upward hydraulic pressure head above the ground surface. To assure that hydraulic conditions beneath the landfill do not change, Ford Motor Company is required by its Act 64 permit to measure static water levels annually in wells at the facility and provide a potentiometric map to MDNR based upon those water levels. Ford Motor Company is also required to monitor their leak detection system on a quarterly basis for chemical constituents. To date, no contaminants have been found in the facility's leak detection wells/lysimeters. In addition to these monitoring programs, Ford Motor Company performs leachate and surface water monitoring at the facility as well as sampling soils along the haul road and sediments from the sedimentation basin.	

Please provide the following information about the person(s) who completed this questionnaire. This information will sist us if clarification of answers is necessary.

	Printed	on recycled paper
Nama	TARIK NAMOUR	
Name:	GEOTECHNICAL ENGINEER HAZARDOUS WASTE PERMITS SECTI WASTE MANAGEMENT DIVISION (517) 335-3198	ON
Address:	JOHN A. HANNAH BLDG. P.O. BOX 30241, LANSING. MI 48909 FOR POLLUTION EMERGENCY 1-800-292-4706	DNR
City/Zip:		and a serie of weeks.
Telephone:		
		on recycled paper
Name:	VIRGINIA LOSELLE	
Title:	ENVIRONMENTAL QUALITY ANALYS HAZARDOUS WASTE PERMITS SECTION WASTE MANAGEMENT DIVISION (517) 373-7974	
Address:	JOHN A. HANNAH BLDG. P.O. BOX 30241, LANSING. MI 48909 FOR POLLUTION EMERGENCY 1-800-292-4706	DNR
City/Zip:	MICHIGAN DEPARTMENT OF NATURAL I	RESOURCES
Telephone:		
Name:		
		•
Telephone:		

Thank you for your cooperation and assistance! This concludes the questionnaire for this land disposal facility.

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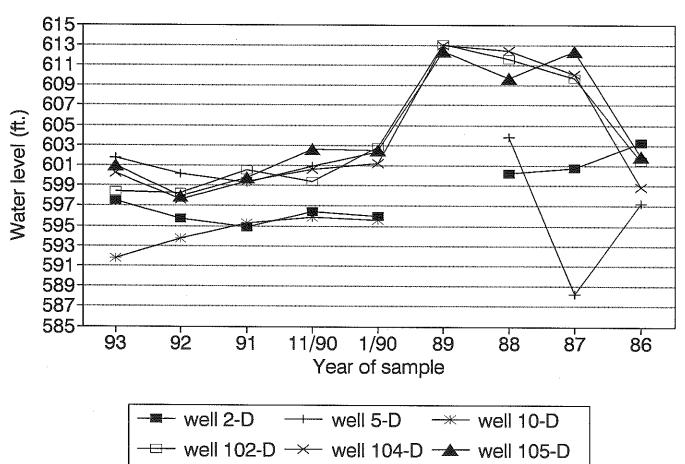
Ford Allen Park Clay Mine Landfill Static Water Levels in feet

	YEAR	93	92	91	11/90	1/90	89	88	87	86
WELL			:							
2-D		597.49	595.76	594.91	596.39	595.99	na	600.26	600.76	603.31
5-D		601.78	600.18	599.29	600.9	602.33	na	603.84	588.27	597.29
10-D		591.73	593.72	595.26	595.87	595.57	na	na	na	na
102-D		598.42	598.28	600.54	599.4	602.8	613.02	611.58	609.67	601.48
103-D		600.26	597.64	599.37	600.64	601.23	613	612.47	610.05	598.88
104-D		600.96	597.97	599.78	602.58	602.5	612.4	609.67	612.4	601.9
105-D		600.59	600.88	600.83	602.23	602.12	na	na	na	na

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Ford Allen Park Clay Mine LF

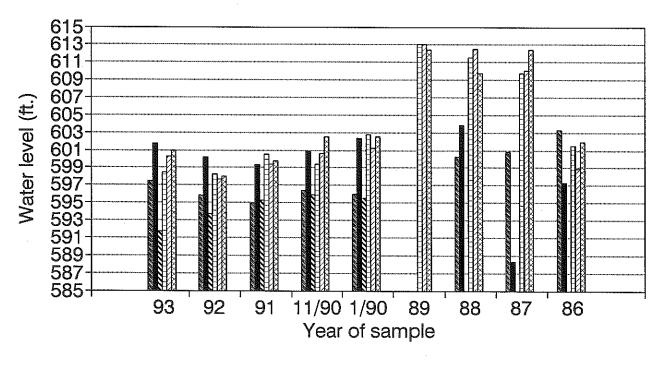
Static Water Levels

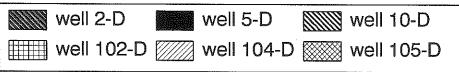


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Ford Allen Park Clay Mine LF







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EPA Surveyment

Environmental and Safety Engineering Staff Ford Motor Company

Suite 608 15201 Century Drive Dearborn, Michigan 48120

December 17, 1993

Mr. Jim Sygo, Chief Waste Management Division Michigan Department of Natural Resources P.O. Box 30241 Lansing, Michigan 48909

Subject:

Annual Report - Environmental Monitoring

Ford Allen Park Clay Mine Landfill

EPA ID No. MID 980 568 711

Dear Mr. Sygo:

Enclosed, as required by our Michigan Act 64 Operating License is the Annual Report for potentiometric monitoring (deep well groundwater) at the subject facility.

Should you have any questions regarding this submittal, please contact Jeff Hartlund of this Office at 313/322-0700.

Sincerely,

Wastes and Hazardous Substances Environmental Quality Office

313/322-4646

Enclosures

c: Mayors of Allen Park, Dearborn and Melvindale John Ciotti Cindy Jackson Elaine Bennett (w/ 3 sets of data) RECEIVED

DEC 23 1993

Waste Management Division



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FORD ALLEN PARK CLAY MINE LANDFILL ENVIRONMENTAL MONITORING - ANNUAL REPORT

Program:

Potentiometric Monitoring (Deep Well Groundwater)

Date of Analysis:

15 December 1993

Weather:

10-25-93:

Mostly Sunny, High 60s (°F)

12-13-93:

Partly Cloudy, Mid 40s (°F)

Sampler:

10-25-93:

Jeff Hartlund (Ford)

David Knutson (Waste Management, Inc)

12-13-93:

David Knutson (Waste Management, Inc)

Method:

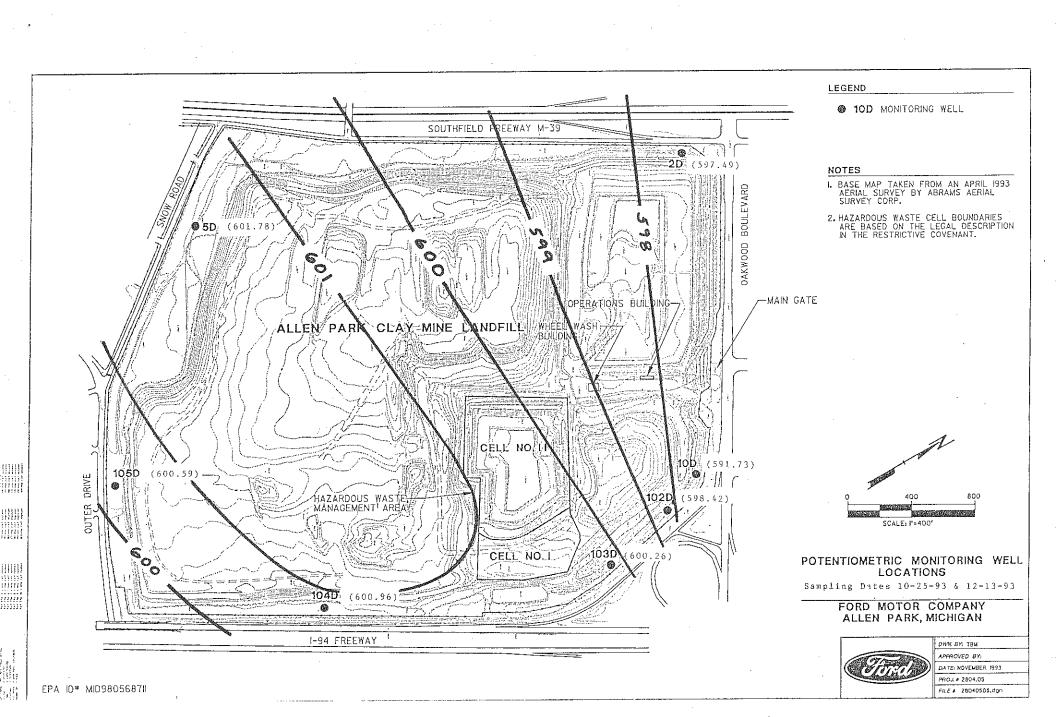
Wallace & Tiernan Series 1000 Pressure Guage Indicator

	Date of		
Well No.	Measurement	<u>Time</u>	Static Water Elevation
2-D	10-25-93	1615 hrs	597.49
5-D	10-25-93	1535 hrs	601.78
10-D	12-13-93	1600 hrs	591.73
102-D	10-25-93	1115 hrs	598.42
103-D	10-25-93	1645 hrs	600.26
104-D	10-25-93	1145 hrs	600.96
105-D	10-25-93	1245 hrs	600.59

Prepared by:

Environmental Quality Office Ford Motor Company 15 December 1993

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OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V.

Suite 608 15201 Century Drive Dearborn, Michigan 48120

December 17, 1991

Environmental and Safety Engineering Staff Ford Motor Company

Ms. Mindy Koch, Acting Chief Waste Management Division Michigan Department of Natural Resources P.O. Box 30028 Lansing, Michigan 48909

Subject:

Annual Report - Environmental Monitoring

Ford Allen Park Clay Mine Landfill EPA ID No. MID 980 568 711

Dear Ms. Koch:

Enclosed, as required by our Michigan Act 64 Operating License, is the Annual Report for potentiometric monitoring (deep well groundwater) at the subject facility.

Should you have any questions regarding this submittal, please contact David O'Connor of this Office at 313/322-0701.

Sincerely,

Jerome S. Amber, P.E., Manager Industrial Waste and Toxic/ Hazardous Substances Environmental Quality Office 313/322-4646

Enclosure

cc: Mayors of Allen Park, Dearborn and Melvindale Ardys Bennett, City of Allen Park Joe Wisk, City of Dearborn Elaine Bennett, MDNR

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FORD ALLEN PARK CLAY MINE LANDFILL ENVIRONMENTAL MONITORING - ANNUAL REPORT

Program:

Potentiometric Monitoring (Deep Well Groundwater)

Date of Analysis:

17 December 1991

Weather:

11-21-91: Cloudy, Mid 50s (°F), 0-5 mph winds

11-22-91: Cloudy, High 40s (°F), 0-5 mph winds

Sampler:

11-21-91: David A. O'Connor

(EQO, Ford Motor Company)

11-22-91: Jeffrey L. Hartlund

(EQO, Ford Motor Company)

Method:

Wallace & Tiernan Series 1000 Pressure Gauge Indicator

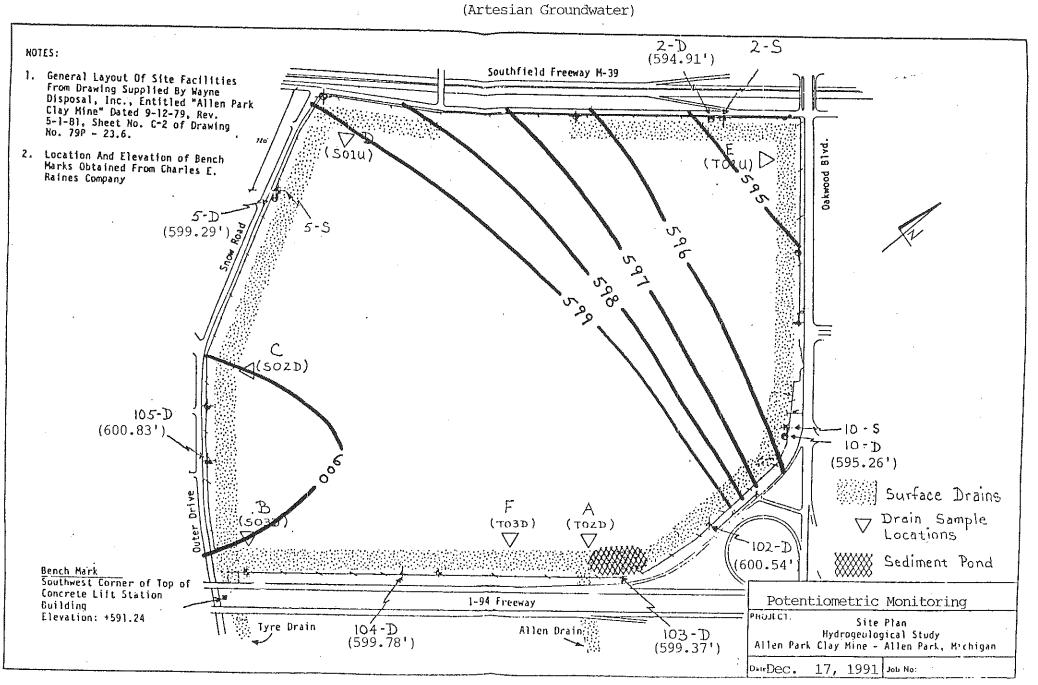
Well No.	Date of Measurement	Timo	Statia Water Elevation
Well INO.	Measurement	<u>Time</u>	Static Water Elevation
2-D	11-21-91	1525 hrs	594.91 ft
5-D	11-21-91	1515 hrs	599.29 ft
10-D	11-21-91	1420 hrs	595.26 ft
102-D	11-22-91	1001 hrs	600.54 ft
103-D	11-22-91	1034 hrs	599.37 ft
104-D	11-22-91	1015 hrs	599.78 ft
105-D	11-21-91	1457 hrs	600.83 ft

Prepared by:

Environmental Quality Office

Ford Motor Company

17 December 1991



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RECEIVED



MAR 05 1990

Waste Management Division

ORIG! CHE ACI Northwillo XC! EPA

Environmental and Safety Engineering Staff Ford Motor Company

Suite 608 15201 Century Drive Dearborn, Michigan 48120

February 27, 1990

Mr. David Slayton Waste Management Division Michigan Department of Natural Resources P.O. Box 30028 Lansing, Michigan 48909

Subject: Annual Groundwater Report

Ford Allen Park Clay Mine Landfill

EPA ID No. MID 980568711/

Dear Mr. Slayton:

Enclosed is the groundwater monitoring report for the subject facility in accordance with our Michigan Act 64 permit issued by MDNR on May 8, 1989.

In a telephone conversation today between David O'Connor of this Office and yourself, I understand that an annual groundwater report under RCRA (40 CFR §265.94(a)(2)(ii)-(iii) and §265.94(b)(2)) is no longer required by the subject facility and your files will be updated. Submittal annually of a potentiometric monitoring report (Part IV Section A.1 and 2 of our permit) will satisfy the State on this subject.

Should you have any questions regarding this matter, please contact David O'Connor at 313/322-0701.

Sincerely,

David S. Miller 313/322-0700

Enclosure

cc: Terry McNiel, MDNR (w/o enclosure)

Mayors of Allen Park, Dearborn and Melvindale (w/o enclosure)

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FORD ALLEN PARK CLAY MINE LANDFILL

Program: Potentiometric Monitoring (Deep Well Groundwater)

Date of Sampling: 5 January 1990

Date of Analysis: 9 January 1990

Weather: Mostly sunny, Low 40's (°F), 5 mph winds

Sampler: David A. O'Connor

Method: Wallace & Tiernan Series 1000 Pressure Gauge Indicator

Well No.	Time	Static Water Elevation
2-D	1555 hrs	595.99 ft
5-D	1543 hrs	602.33 ft
10-D	1641 hrs	595.57 ft
102-D	1430 hrs	602.80 ft
103-D	1615 hrs	601.23 ft
104-D	1448 hrs	602.50 ft
105-D	1515 hrs	602.12 ft

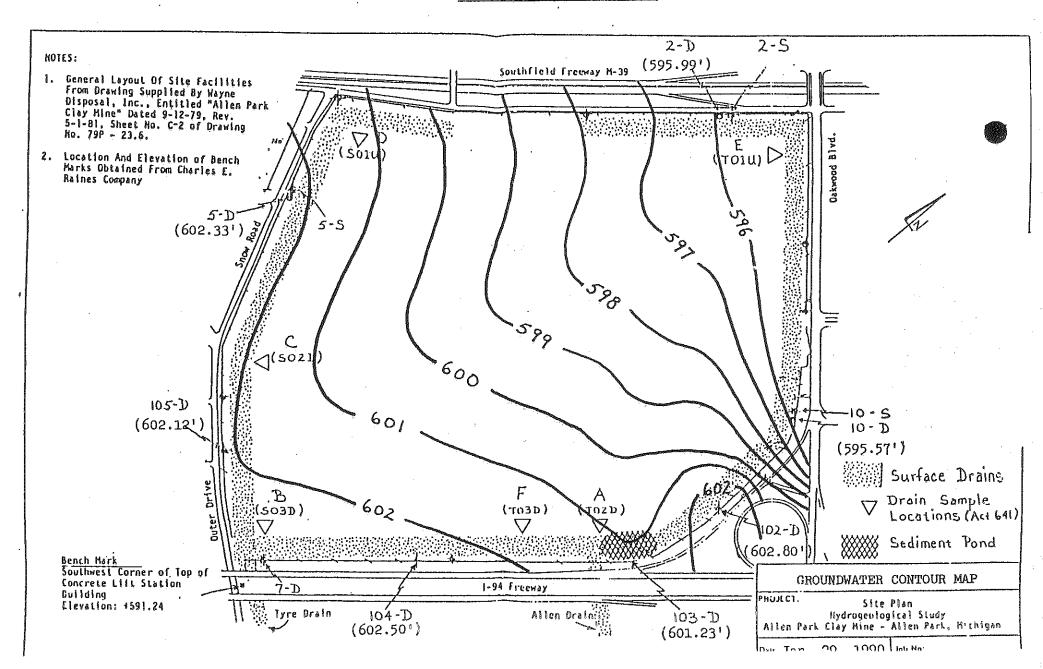
Prepared by:

Stationary Source Environmental Control Office

Ford Motor Company 12 January 1990

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FORD ALLEN PARK CLAY MINE



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FORD ALLEN PARK CLAY MINE LANDFILL

Program: Potentiometric Monitoring (Deep Well Groundwater)

Date of Sampling: 5 January 1990

Date of Analysis: 9 January 1990

Weather: Mostly sunny, Low 40's (°F), 5 mph winds

Sampler: David A. O'Connor

Method: Wallace & Tiernan Series 1000 Pressure Gauge Indicator

Well No.	Time	Static Water Elevation
2 - D	1555 hrs	595.99 ft
5-D	1543 hrs	602.33 ft
10-D	1641 hrs	595.57 ft
102-D	1430 hrs	602.80 ft
103-D	1615 hrs	601.23 ft
104-D	1448 hrs	602.50 ft
105-D	1515 hrs	602.12 ft

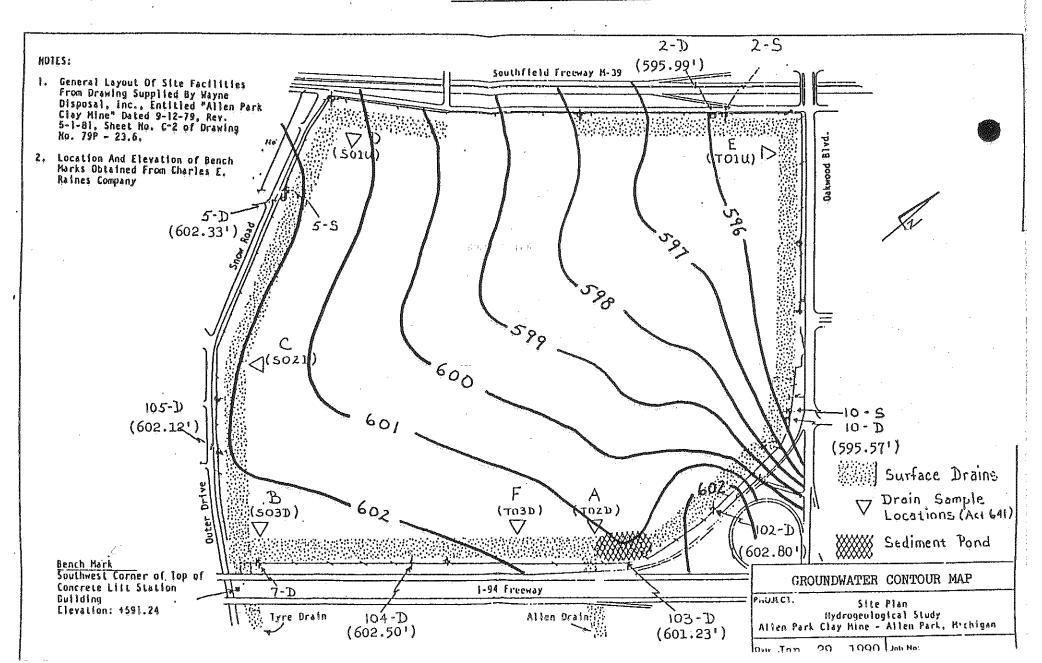
Prepared by:

Stationary Source Environmental Control Office

Ford Motor Company 12 January 1990

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FORD ALLEN PARK CLAY MINE



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FORD ALLEN PARK CLAY MINE LANDFILL

Program:

Potentiometric Monitoring (Deep Well Groundwater)

Date of Sampling:

5 January 1990

Date of Analysis: 9 January 1990

Weather:

Mostly sunny, Low 40's (°F), 5 mph winds

Sampler:

David A. O'Connor

Method:

Wallace & Tiernan Series 1000 Pressure Gauge Indicator

Well No.	Time	Static Water Elevation
2-D	1555 hrs	595.99 ft
5-D	1543 hrs	602.33 ft
10-D	1641 hrs	595.57 ft
102-D	1430 hrs	602.80 ft
103-D	1615 hrs	601.23 ft
104-D	1448 hrs	602.50 ft
105-D	1515 hrs	602.12 ft

Prepared by:

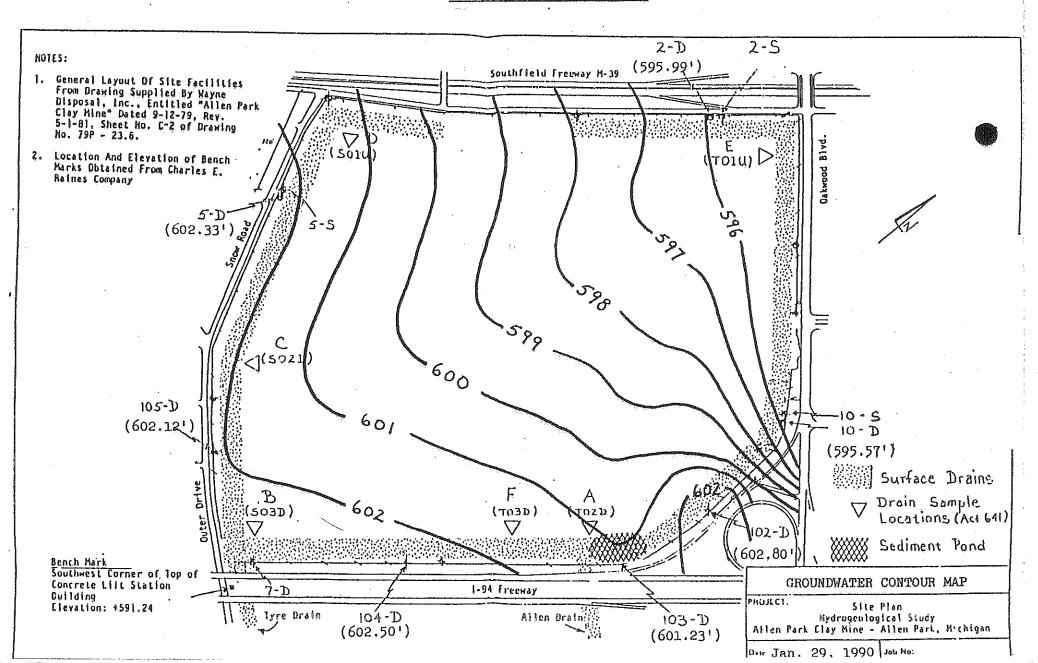
Stationary Source Environmental Control Office

Ford Motor Company

12 January 1990

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FORD ALLEN PARK CLAY MINE



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SUPERFUND PROGRAM MANAGEMENT BRANCH

Environmental and Safety Engineering Staff Ford Motor Company

Suite 608 15201 Century Drive Dearborn, Michigan 48120

March 1, 1989

U. S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

Attention: 5HE - 12

Subject: Annual Groundwater Monitoring Report Ford Allen Park Clay Mine Landfill

EPA I.D. No. MID 980 568 711

The enclosed groundwater monitoring data are submitted in accordance with the reporting requirements of 40 CFR 265.94 for the subject facility.

The monitoring plan requested by William E. Muno, Chief, RCRA Enforcement Section, in his November 27, 1985 letter is one of annual sampling and static water level measurements of upgradient wells 5-D and 5-S, and downgradient wells 2-D, 2-S, 102-D, 103-D and 104-D. The waste-specific parameters to be analyzed are: cadmium, cyanide (complexed), hexavalent chromium, lead, naphthalene, nickel, and phenol. As stated in the Allen Park Clay Mine groundwater waiver demonstration submitted in 1985, the monitoring program in place is unfounded in detecting the migration of hazardous constituents from the site. Therefore, we conclude that the enclosed data do not reflect activities associated with the Allen Park Clay Mine Hazardous Waste Landfill.

The reported metals concentrations may be found in the attached Groundwater Monitoring Data Sheets. Suspended solids were observed in all of the samples, and well 2-D samples were noted as appearing milky white and containing significant suspended solids. It is believed that the attached data reflect influence associated with the galvanized well construction and the presence of suspended solids that were not filtered prior to analysis.

Should you have any questions please contact David O'Connor (313/322-0701) or me (313/322-4646).

Attachments

cc: Mr. Alan J. Howard - MDNR

Very truly yours,

/Jerome S. Amber

Principal Staff Engineer

Stationary Source Environmental

Control Office

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		V.				
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		N.				

Wel1	No	.: Shallow Well 5-S	QMR	Designation	<u>a</u> : A05U
I.		Well Data USGS Coordinate	<u>:s</u>		
	b) c) d)	Casing Elevation: 598.27' f) Wa Casing Material: Galvanized Steel g) Da Casing Depth: 580.02' h) Ti Casing Diameter: 2" Static Water El.: 594.10'	ite:	-50.0" 12-15- NA	
II.		Well Bailing Information	<u>.</u>		
	a) b)	Device Employed: Tetton bailer w/PP cope c) Da Gallons Purged: 1.7 d) Time		12-15-88 NA	3
III.		Weather Conditions			
	a) b)	Weather on Date of Bailing: Cloudy, Tee Weather on Date of Sampling: Cloudy, Tee	ens ns		
IV.		Sampling and Laboratory Information	mation		
	b) c)	Sampling Date: 12-16-88 Sampling Time: 11:15 am Sampling Personnel: A. Gauthier & C. Gauth Laboratory: Burmah Technical Service			
٧.		Annual Sampling Parameters	<u>s</u>		
Parar	net	<u>er</u>		<u>Resul</u>	<u>.t</u>
Lead Nicke Hexav	, To el, valo L Cy chal	Total ent Chromium, Total yanide		0.01 4 0.05 4 0.02 4 0.05 4 0.02 4 10	mg/l mg/l mg/l μg/l
VI.		Comments			
Wate Few	<u> </u>	level recorded using a Well Wigard Water of	Level Mete	y, Mochel	6000.
		J. A. U (Sansi			
				700	
14.1 108		580.02 = 14.08' 0.163 gallons/ft = 2.295 gallons in the well ant purged was less than the aut in the	e well bon	ę.	

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Well	No.: Deep Well 5-D		QMI	R Designation: H07U
I.		Well Data USGS Coor	<u>dinates</u>	
	a) Casing Elevation:b) Casing Material:c) Casing Depth:d) Casing Diameter:e) Static Water El.:	Galvanized Steel 516.70' 2"	f) Water Level g) Date: h) Time:	12-21-88
II.		Well Bailing Infor	<u>mation</u>	
	b) Gallons Purged:	Artesian; Self Purgi: Steel Stem+Valve and Artesian - overnight flow N-29-88	Silicone Stopp	oying a Stainless per <u>NA</u>
III.		Weather Conditi	ons	
	a) Weather on Date ob) Weather on Date o	f Bailing: <u>Cloudy,</u> f Sampling: <u>Cloudy,</u>	30's 30's	
IV.	<u>Sam</u>	pling and Laboratory	Information	
	b) Sampling Time:	1: 00 pm 1: A. Gauthier & C. (Burmah Technical S		
٧.		Annual Sampling Para	ameters	
Lead, Nicke Hexav	um, Total Total 1, Total alent Chromium, Total Cyanide	1		Result < 0.01 mg/1 < 0.05 mg/1 < 0.02 mg/1 < 0.05 mg/1
	halene			< 0.02 mg/l < 10 μg/l < 10 μg/l
VI.		Comments		
Wate Gauge	suspended solids.	ising a Wallace !	(iernan Serie	s 1000 Pressure
Les	suspended solida.	D. A. O'Conner		
-	t'-516.70' = 87.1 pt x 0.163 gal/ft = 1, it is arteman	1470 aallans	not wood ba	in the comments of the comment

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Groundwater Monitoring Data Sheet EPA Annual Groundwater Requirements

Well No	o.: Shallow Well 2-S	,	-		OMD D		* O O T T
					<u>QMR D</u>	esignation:	A020
I.		Well Data USGS Coor	dina	<u>ates</u>			
b) c) d)	Casing Elevation: Casing Material: Casing Depth: Casing Diameter: Static Water El.:	Galvanized Steel 578.33' 2"	f) g) h)	Water Date: Time:	Level:	- 91.8" 12-15-88 NA	
II.		Well Bailing Inform	mati	<u>Lon</u>			
a) b)	Device Employed: 4	ellon bailer W/P? rope 1.5	c) d)	Date: Time:		NA NA	
III.		Weather Conditi	ons				
a) b)	Weather on Date of Weather on Date of	Bailing: Cloudy, Sampling: Cloudy,	7	eens 30's			
IV.	Samp	ling and Laboratory	Int	format	lon		
b) c)					Inc.		
V.		Annual Sampling Par	amet	ters			
Paramet	<u>er</u>					<u>Result</u>	
Cadmium Lead, T Nickel, Hexaval Total C Naphtha Phenol	otal Total ent Chromium, Total yanide					410 p	ng/1 ng/1 ng/1 ng/1
VI.		Comments					
Water A Water A due to for pla	level recorded using water had recharged was whether on 12 mot enough sample on explanation of an explanation of an	well was evanot by 12-16-88 - A 2-22-88 for all p 3 gals. collected). affind results.	Wa vel ar see	ter Le.	rel Meter Spals) Thirty Efergi 1-24-2 Letter	Model 6 50 12-15-88 reclarges of for phen 19 thus 1- dated Man	000 Shut bowly. 51-89 ch 1,

IIb: only one well vol. purged. Slow recharge

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		* 2	
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Well No.: Deep Well 2-1)	<u>QMR</u>	Designation: G06U
I.	Well Data USGS Coop	<u>cdinates</u>	
a) Casing Elevationb) Casing Materialc) Casing Depth:d) Casing Diametere) Static Water E.	: Galvanized Steel 518.10'	<pre>f) Water Level: g) Date: h) Time;</pre>	-0.69' 12-21-88 3:12 pm
II. a) Device Employed b) Gallons Purged	Well Bailing Infor PUC pump to -so' then 1: Toflon bailer w/PP rope To dryness		1-31-89 3:35 pm
III.	Weather Conditi	<u>Lons</u>	
a) Weather on Date b) Weather on Date	e of Bailing: Partly so of Sampling: Cloudy,	unny, 57°F overcast, 10 mph	winds, 35°F
IV.	Sampling and Laboratory	/ Information	
a) Sampling Date:b) Sampling Time:c) Sampling Persond) Laboratory:	mel: D. A. O'Connor Burmah Technical	om, respectively - Ford	
٧.	Annual Sampling Par	cameters	
<u>Parameter</u>			<u>Result</u>
Cadmium, Total Lead, Total Nickel, Total Hexavalent Chromium, To Total Cyanide Naphthalene Phenol	tal	· _q	4 0.01 mg/1 0.17 mg/1 4 0.02 mg/1 4 0.05 mg/1 4 0.02 mg/1 4 10 μg/1 4 10 μg/1
VI.	<u>Comments</u>		
Water level worded us to heavy suspended a on 2-1089 then following against solids with significant solids	Slids. Well recharges - 24 hours of rechange	slowly. Metals (; matphthaline, p. an Arthorn of case	Model 6000. Few total were sampled hend and total.
- 111 9 10 1	2 9/2-17-88 And had to well on 12-21-88. Dec 10	we thewed using a even letter dated Ma "Conno?	propere touch Lost al 1, 1989, explenation of

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Well No.: Deep Well 1	.02-D	<u>QMR</u>	Designation: CO2U
I.	Well Data USGS	Coordinates	
a) Casing Elevatb) Casing Materic) Casing Depth:d) Casing Diamete) Static Water	al : PVC 498.30' er: 2"		12-15-88 NA
II.	Well Bailing I	nformation	
a) Device Employb) Gallons Purgec) Date:	ed: Artesian; Self P Steel Stem+Valve d: Artesian - Overnight 12-15-88	e and Silicone Stoppe + flow froze during the	er.
III.	<u>Weather Con</u>	ditions	
a) Weather on Dab) Weather on Da	te of Bailing: <u>Clo</u> te of Sampling: <u>Clo</u>	udy, Teens	
IV.	Sampling and Labora	tory Information	
a) Sampling Dateb) Sampling Timec) Sampling Persd) Laboratory:	: <u>4:05 pm</u> onnel: <u>D. A. O'Con</u>	nor - Ford cal Services, Inc.	
V.	Annual Sampling	<u>Parameters</u>	
<u>Parameter</u>			Result
Cadmium, Total Lead, Total Nickel, Total Hexavalent Chromium, T Total Cyanide Naphthalene Phenol	rotal		$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$
VI.	Comment	<u>ts</u>	
well via the SS	ded using a Wallace I had frozen in 2 valve on 12-16-88 he 24 hour perior	he Tygon tube u - not Known a	sed to purge the

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w.			

<u>Well</u>	No.	: Deep	Wel	L 10:	3 - D					QMR :	Desi	gnatior	<u>ı</u> : D03U
I.						Well Data U	SGS Coord	lina	ates				
	b) c) d)	Casing Casing Casing	Mate Dept Diam	eria: th: meter	l : r:	501.40'		f) g) h)	Water Date: Time:	Level:	+ 12 N	95.2	88
II.						Well Baili	ng Inform	nati	<u>ion</u>				
	b)				: <u>A</u>	Artesian; Se Steel Stem+Va Artesian - Over 12-15-88	alve and	Sil ಎ	licone	Employ: Stoppe:	ing a		ıless
III.						Weather	Conditio	ns					
	a) 1 b) 1	Weather Weather	r on r on	Date Date	e of	Bailing: _ Sampling: _	Cloudy,		Teens Teens				
IV.				<u> </u>	Samp	ling and Lab	oratory	Inf	Cormati	on			
	b) ;	Samplin	ng Ti ng Pe	me: ersor	mel	12-16-8. 10:30 an Burmah Tec	er & C.	<u>Ga</u> Jerv	uthier lices,	Inc.			
V.						Annual Sampl	ling Para	met	ers				
Param	<u>ietei</u>	<u>r</u>										<u>Resul</u>	<u>t</u>
Lead, Nicke Hexav	Tot 1, 1 aler Cya hale	rotal nt Chro anide	mium	., То	tal						4.	0.01 0.05 0.02 0.05 0.02 10	mg/l mg/l
JI.						Com	ments						
		Tew					Connor	Tie	enan	Series	(0)	00 Pr	essure

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		er.	
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Well No.: Deep Well 104-D		2	MR Designation: E04U
I.	Well Data USGS Coor	<u>dinates</u>	
a) Casing Elevation:b) Casing Material:c) Casing Depth:d) Casing Diameter:e) Static Water El.:	PVC 508.60' 2"		rel: <u>† 102.9"</u> 12-15-88 NA
II.	Well Bailing Inform	nation	
b) Gallons Purged: ,	Steel Stem+Valve and	Silicone Sto ∞	loying a Stainless
III.	Weather Condition	ons	
a) Weather on Date ofb) Weather on Date of	f Bailing: <u>Cloudy,</u> f Sampling: <u>Cloudy</u> ,	Teens Teens	
IV. <u>Sam</u>	pling and Laboratory	Information	
a) Sampling Date:b) Sampling Time:c) Sampling Personne:d) Laboratory:	10:45 am L: A. Gauthier & C.		
٧.	Annual Sampling Para	meters	
<u>Parameter</u>			<u>Result</u>
Cadmium, Total Lead, Total Nickel, Total Hexavalent Chromium, Total Total Cyanide Naphthalene Phenol	L		$\begin{array}{c cc} 0.01 & mg/1 \\ \hline 4 & 0.05 & mg/1 \\ \hline 0.03 & mg/1 \\ \hline 4 & 0.05 & mg/1 \\ \hline 4 & 0.02 & mg/1 \\ \hline 4 & 10 & \mug/1 \\ \hline 4 & 10 & \mug/1 \\ \hline \end{array}$
VI.	<u>Comments</u>		
Water level recorded us Gauge. Few suspended	ing a Wallace 1 -	Ciernan Ser	ies 1000 Pressure
3 Suspenses	D. A. O'Conno	7	

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Ford Motor Company

U. S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

Attention: 5HE - 12

Subject: Annual Groundwater Monitoring Report

Ford Allen Park Clay Mine EPA I.D. No. MID 980 568 711

Enclosed is the groundwater monitoring data for shallow well 5-S, as referenced in my February 29, 1988 letter. Please note that this data completes the 1987 Annual Groundwater Monitoring Report, in accordance with the reporting requirements of 40 CFR 265.94 for the subject facility.

Very truly yours,

Douglas A. Painter, Manager

Mining Department

DAP/dao

Attachment

xc: Mr. Alan J. Howard - MDNR (w/attachment)

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FORD ALLEN PARK CLAY MINE MID 980 568 711 Groundwater Monitoring Data Sheet EPA Annual Groundwater Requirements

Well No.: Shallow Well 5-S		QMR Designation: A05U
I. Well	Data USGS Coordinate	<u>es</u>
 a) Casing Elevation: 5 b) Casing Material: G c) Casing Depth: 5 d) Casing Diameter: 2 e) Static Water Elevat 	alvanized Steel g) 80.02' h)	Water Level: + 1.8' Date: 4-5-88 Time:
II. Well	Bailing Information	<u>n</u>
a) Device Employed: Te b) Gallons Purged: <u>2</u>	flon Bailer c) . gallons d)	Date: 4-5-88 Time:
III.	Weather Conditions	
a) Weather on Date ofb) Weather on Date of	Bailing: Sunny, Sampling: -	50's
IV. Sample Collec	tion and Laboratory	Information
a) Sampling Date:b) Sampling Time:c) Person(s) Sampling:d) Laboratory Name:	M. Regan and B.	Thomas ervices, Inc.
V. An	nual Sample Paramete	ers
Parameter	Analytical Method	Result
Cadmium Lead Nickel Hex. Chromium Total Cyanide Naphthalene Phenol	EPA 200.7 EPA 200.7 EPA 200.7 EPA 312A-5+d. EPA 335-2 EPA 610 EPA 625	<pre></pre>
VI.	Comments	
Sample completes 1987	requirements	

:			



Ford Motor Company

3001 Miller Road Dearborn, Michigan 48121

U. S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

Attention: 5HE - 12

Subject: Annual Groundwater Monitoring Report

Ford Allen Park Clay Mine EPA I.D. No. MID 980 568 711

February 1988

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U.S. EPA, REGION V
OFFICE OF THE DIRECTOR

The enclosed groundwater monitoring data are submitted in accordance with the reporting requirements of 40 CFR 265.94 for the subject facility.

The monitoring plan requested by William E. Muno, Chief of the RCRA Enforcement Section, in his November 27, 1985 letter is one of annual sampling and static water level measurements of upgradient wells 5-D and 5-S, and downgradient wells 2-D, 2-S, 102-D, 103-D and 104-D. The waste-specific parameters to be analyzed are: cadmium, cyanide (complexed), hexavalent chromium, lead, naphthalene, nickel, and phenol. As stated in the Allen Park Clay Mine groundwater waiver demonstration submitted in 1985, the monitoring program in place is unfounded in detecting the migration of hazardous constituents from the site. Therefore, we conclude that the enclosed data do not reflect activities associated with the Allen Park Clay Mine Hazardous Waste Landfill.

All requested information is attached with the exception of shallow well 5-S. Samples obtained from shallow well 5-S have been submitted for analysis. Laboratory results are expected within the month and will be forwarded to you under separate cover. Please note that upon bailing shallow well 2-S, there was insufficient recharge after twenty-five hours to obtain a sample; this well has a prior history of recharging slowly.

Very truly yours,

Douglas A. Painter, Manager

Mining Department

DAP/dao

Attachment

xc: Mr. Alan J. Howard - MDNR (w/attachments)

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Samp	oling Date: <u>//- 2</u>	14-87		
Time	of Sample Collect	ion:		
				and B. Biesner
Labo	oratory Conducting	Analysis: <u>Burma</u>	h Technical Se	cruices, Inc.
	<u>No.</u> 5 Deep	OMR DESIGNAT		
I.	Casing Depth	596.14' Galvanized Steel 516.70	H ₂ O + 7. 70	ing in inches of
	STATIC WATER ELEV	ATION(ft) 603.8	<u>4'</u> Taken on <u>//-</u>	23-87 Time
II.	Well Bailing Data Device Used: Sel Material of Const Time of Well Purg Flow Rate:	f bailing device	ss steel with sili Stop Gallons Purged:	con stopper. /Date
III.	Sampling Data Significant Weath			Ţ
Annı	al Sample Paramete	re		
	<u>Parameters</u>	<u>Container</u>	<u>Preservative</u>	Analytical Results
	Cadmium . Lead Nickel	Plastic	HNO ₃ to pH <2	<pre></pre>
	Hex Chromium	Plastic	Cool to 4°C	<0.05
	Total Cyanide	Plastic	NaOH to pH >12	< 0.0.2
	Naphthalene	Glass	Cool to 4°C	0.0/8
	Phenol	Glass	H ₂ SO ₄ to pH <2	40.01
IV.	Field Analytical	Data (Optional)		
	рН	Specific Conduct:	ivity	Temp
Appe Misc	earance of Samples:			

Samp:	ling Date: 2-26-8	58		
Time	of Sample Collection:	10:30 am		
Perso	on(s) Collecting Sampl	e: <u>Ed Chra</u>	SZCZ	
Labo	ratory Conducting Anal	ysis: <u>Burmah</u>	Technical Serv	nees Inc.
WELL	No. 2 Shallow	QMR DESIGNATI	ON A02U	
I.	Well Data USGS Coordi Casing Elevation 595 Casing Material Gal Casing Depth 578	.66' vanized Steel	Casing Diamete	
	STATIC WATER ELEVATION	N(ft) 583.7/	Taken on 2:	25-83 Time 09:30
	Well Bailing Data Device Used: Bailer Material of Construct Time of Well Bailing: Gallons Purged: 70	09:35	Date <u>2-25-33</u>	
III.	Sampling Data Significant Weather Co Sample Equipment: Ba	Conditions: <u>C</u>	lear and Cold	
Annua	al Sample Parameters			
	_	<u>Container</u>	Preservative	Analytical Results
	Lead Nickel	Plastic	HNO_3 to pH <2	No Sample mg/1 NS NS
	Hex Chromium	Plastic	Cool to 4°C	NS
	Total Cyanide	Plastic	NaOH to pH >12	NE
	Naphthalene	Glass	Cool to 4°C	<u> </u>
	Phenol	Glass	H ₂ SO ₄ to pH <2	<u> </u>
IV.	Field Analytical Data	(Optional)		
	pH Spe	ecific Conductiv	ity	Temp
	arance of Samples: . Notes: Well dry	25 hours	after bailing	
	•		<i>()</i>	

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Samp1	ing Date:	87		
Time	of Sample Collection:		-	
Perso	on(s) Collecting Sample	: J. Bolia,	J. Collins au	d B. Biesner
	catory Conducting Analy			
	No. 2 Deep	QMR DESIGNATI		-
I.	Well Data USGS Coording Casing Elevation 600. Casing Material PVC Casing Depth 518.	.76'	Casing Diamete Water Level <u>-</u>	
	STATIC WATER ELEVATION	(ft) 600.26	Taken on _//-2	3-87 Time
II.	Well Bailing Data Device Used: Bailer Material of Construct Time of Well Bailing: Gallons Purged: /6.6		Date	
III.	Sampling Data Significant Weather Co Sample Equipment: Ba			·
Annu	al Sample Parameters			
	Parameters Cadmium Lead Nickel	<u>Container</u> Plastic	Preservative HNO ₃ to pH <2	Analytical Results
	Hex Chromium	Plastic	Cool to 4°C	40.05
	Total Cyanide	Plastic	NaOH to pH >12	40.02
	Naphthalene	Glass	Cool to 4°C	< 0.010
	Phenol	Glass	H_2SO_4 to pH <2	50.012
IV.	Field Analytical Data	(Optional)		
	pH Spe	cific Conductiv	ity	Temp
Appe Misc	arance of Samples: . Notes:		Additional and a first war to be	

Samp.	ling Date: <u>// 24</u>	-8/		
Time	of Sample Collection:		····	
Perso	on(s) Collecting Sampl	e: J. Bolin	, J. Collins	and B. Biesner
	ratory Conducting Anal			
WELL	<u>No.</u> 102D	QMR DESIGNATI	ON CO2U	
I.	Well Data USGS Coordication 600 Casing Material PVC Casing Depth 498).81' ;	Casing Diamete Pressure Readi H ₂ O + /O.	ng in înches of
	STATIC WATER ELEVATION	N(ft) 611.58	Taken on //-2	<u>3-87</u> Time
II.	Well Bailing Data Device Used: Self ba Material of Construct Time of Well Purging: Flow Rate:	ion: Stainless		on stopper. Date <u>Free Flow</u> Overnight
III.	Sampling Data Significant Weather (Sample Equipment: Di		from purging devi	ce.
Annua	al Sample Parameters			
	Parameters Cadmium	Container	Preservative	Analytical Results
	Lead Nickel	Plastic	HNO ₃ to pH <2	< 0.05 < 0.02
	Hex Chromium	Plastic	Cool to 4°C	<u> </u>
	Total Cyanide	Plastic	NaOH to pH >12	4 0.02
	Naphthalene	Glass	Cool to 4°C	4 0.010
	Phenol	Glass	H_2SO_4 to pH <2	< 0.010
IV.	Field Analytical Data	(Optional)		
	pH Spe	cific Conductiv	ity	Temp
Appea Misc	arance of Samples: . Notes:	ag a training and a second a second and a second a second and a second a second and		

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	4-87		
ime of Sample Collect	cion:		
erson(s) Collecting S	Sample: <u>J. Co//</u>	lins, J. Bolin	and B. Biesner
aboratory Conducting	Analysis: Burm	nah Technical	Services, Inc.
ELL No. 103D	QMR DESIGNA	ATION DO3U	
. Well Data USGS Co Casing Elevation Casing Material Casing Depth	605.06' PVC	Casing Diamete Pressure Read H ₂ O <u>+ 7.</u>	er 2" ing in inches of
STATIC WATER ELEV	VATION(ft) 6/2.	47' Taken on //-	23-87 Time
I. <u>Well Bailing Data</u> Device Used: Sel Material of Const Time of Well Purg Flow Rate:	of bailing device	ess steel with sili Stop Gallons Purged:	con stopper. /Date <u>Free Flow Overn</u>
II. <u>Sampling Data</u> Significant Weath Sample Equipment:	ner Conditions: Direct discharg	ge from purging dev	
II. <u>Sampling Data</u> Significant Weath Sample Equipment:	ner Conditions: Direct discharg	ge from purging dev	ice.
II. <u>Sampling Data</u> Significant Weath Sample Equipment: nnual Sample Paramete	ner Conditions: Direct dischargers Container		
II. <u>Sampling Data</u> Significant Weath Sample Equipment: nual Sample Paramete <u>Parameters</u> Cadmium Lead	ner Conditions: Direct dischargers Container	ge from purging dev	Analytical Results 4 0. 0/ mg/l 4 0. 05
II. Sampling Data Significant Weath Sample Equipment: nual Sample Paramete Parameters Cadmium Lead Nickel Hex Chromium	ner Conditions: Direct dischargers Container Plastic Plastic	Preservative HNO3 to pH <2	Analytical Results <u>(0.01</u> mg/l <u>(0.05</u> <u>(0.05</u> <u>(0.05</u>
II. Sampling Data Significant Weath Sample Equipment: anual Sample Paramete Parameters Cadmium Lead Nickel Hex Chromium	ner Conditions: Direct dischargers Container Plastic Plastic	Preservative HNO3 to pH <2 Cool to 4°C	Analytical Results <u>(0.01</u> mg/l <u>(0.05</u> <u>(0.05</u> <u>(0.05</u>
II. Sampling Data Significant Weath Sample Equipment: nual Sample Paramete Parameters Cadmium Lead Nickel Hex Chromium Total Cyanide	ner Conditions: Direct dischargers Container Plastic Plastic Plastic	Preservative HNO ₃ to pH <2 Cool to 4°C NaOH to pH >12	Analytical Results 4 0. 0/ mg/l 4 0. 05 5 0. 0.2 4 0. 05 4 0. 05 4 0. 05
II. Sampling Data Significant Weath Sample Equipment: nnual Sample Paramete Parameters Cadmium Lead Nickel Hex Chromium Total Cyanide Naphthalene	ner Conditions: Direct dischargers Container Plastic Plastic Plastic Glass Glass	Preservative HNO3 to pH <2 Cool to 4°C NaOH to pH >12 Cool to 4°C	Analytical Results 4 0. 0/ mg/l 4 0. 05 5 0. 0.2 4 0. 05 4 0. 05

Samp.	ling Date: _//- 24	-87	•	
Time	of Sample Collection			
Perso	on(s) Collecting Sampl	le: J. Bolin	, J. Collins	and B. Biesner
Labor	on(s) Collecting Sampl	lysis: Burmar	1 Technical	Services, Inc.
	<u>No.</u> 104D	OMR DESIGNATI		
I.	Well Data USGS Coord: Casing Elevation 603 Casing Material PVC Casing Depth 508	3.82° C 8.60	H ₂ 0 <u>+ 5.8</u>	ng in inches of
	STATIC WATER ELEVATION	5N(IC) 607, 6	/ Taken on //-J	<u>3-8/</u> Time
II.	Well Bailing Data Device Used: Self be Material of Construct Time of Well Purging Flow Rate:	tion: Stainless		on stopper. Date Free Flow Overnight
III.	Sampling Data Significant Weather (Sample Equipment: D		from purging devi	ce.
Annua	al Sample Parameters			
	Parameters Cadmium	<u>Container</u>	Preservative	Analytical Results
	Lead Nickel	Plastic	HNO ₃ to pH <2	< 0. 05 < 0.02
	Hex Chromium	Plastic	Cool to 4°C	40.05
	Total Cyanide	Plastic	NaOH to pH >12	40.02
	Naphthalene	Glass	Cool to 4°C	< 0. DIO
	Phenol	Glass	$\rm H_2SO_4$ to pH <2	< 0. 0/0
IV.	Field Analytical Data	a (Optional)		
	pH Spe	ecific Conductiv	rity	Temp
Appea Misc.	arance of Samples:			

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Ford Motor Company

3001 Miller Road Dearborn, Michigan 48121

February 26, 1987

U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

Attention: 5HE - 12

Subject: Ford Allen Park Clay Mine

Annual Groundwater Monitoring Results

MID 980 568 711

BECENVED

· AR 02 1987



The enclosed groundwater monitoring results are submitted in accordance with the reporting requirments of 40 CFR 265.94 for the subject facility.

As stated in the Allen Park Clay Mine groundwater waiver demonstration submitted in 1985, we believe that the monitoring program in place cannot detect migration of hazardous constituents from the site. Therefore, we conclude that the enclosed data do not reflect activities associated with the Allen Park Clay Mine Hazardous Waste Landfill.

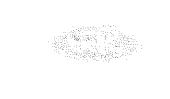
Very truly yours,

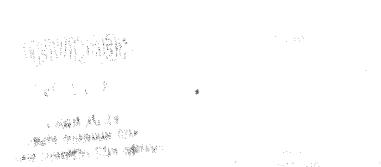
Douglas A. Painter,

Manager

Mining Department

cc: Mr. Alan J. Howard - MDNR (w/attachments)





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Sampl	ing Date: Febe	ARY 20 1887		
	of Sample Collecti	V	4	
	on(s) Collecting Sa			
Labor	ratory Conducting A	Analysis: <u>Hyde</u>	20 - SSELD	
MELL	No. 104D	OMR DESIGNAT	ION E04U	
Ι.	Well Data USGS Coo Casing Elevation Casing Material Casing Depth	603.82' PVC	H ₂ O <u>79.8"</u> +	ng in inches of
	STATIC WATER ELEVA	ATION(ft) 6/2.4/	Taken on 2-/	9-87 Time 10:35
II.	Time of Well Purg	ruction: Stainles ing: Start/Date 🗡	s steel with silic o 25 2/9 Stop/ Gallons Purged:	Date 11:00 20
III.	Sampling Data Significant Weath Sample Equipment:	er Conditions: <i>C</i> Direct discharge	leal i Cold from purging devi	.ce.
Annu	al Sample Paramete	rs		
	<u>Parameters</u> Cadmium	Container	<u>Preservative</u>	Analytical Results
	Lead Nickel	Plastic	HNO ₃ to pH <2	<0.05 <0.05
	Hex Chromium	Plastic	Cool to 4°C	< 0.005
	Total Cyanide	Plastic	NaOH to pH >12	<0.02
	Napthalene	Glass	Cool to 4°C	<0.010
	Phenol	Glass	H_2SO_4 to pH <2	< 0.002
ıv.	Field Analytical	Data (Optional)		
	рн <u>7.5</u>	Specific Conduct	ivity <u> </u>	Temp <u>76</u>
App Mis	earance of Samples c. Notes:	: Clear - No	oder	

			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
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Sampl	ing Date: Febluary	20, 1987		
Time	of Sample Collection:	09.45	Con Carriera	
Perso	on(s) Collecting Sampl	le: Ed Chras	LLZ	•
Labor	atory Conducting Anal	iysis: <u>Hydro</u>	- SSECO	
WELL	No. 103D	OMR DESIGNATION	<u>ой</u> розп	
I.	Well Data USGS Coord: Casing Elevation 60: Casing Material PVC Casing Depth 50:	5.06'	Casing Diamete Pressure Readi H ₂ O <u>42.6" </u>	ng in inches of
·	STATIC WATER ELEVATION	ON(ft) 610.05	Taken on 2-15	- 87 Time <u>09:30</u>
II.	Well Bailing Data Device Used: Self b Material of Construc Time of Well Purging Flow Rate: 25/4.634	tion: Stainless : Start/Date <i>09</i>	:36 2-19 Stop/	Date 09.45 2-20
III.	Sampling Data Significant Weather Sample Equipment: D			ice.
Annu	al Sample Parameters			
	Parameters Cadmium Lead	<u>Container</u> Plastic	Preservative HNO3 to pH <2	Analytical Results <o.o.o.o.mg <o.o.o.o.o.o.o.o.o.o.o.o.o.o.o.o.o.o.o.<="" l="" td=""></o.o.o.o.mg>
	Nickel Hex Chromium	Plastic	Cool to 4°C	<0.05 <0.005
	Total Cyanide	Plastic	NaOH to pH >12	<0.02
	Napthalene	Glass	Cool to 4°C	< 0.010
	Phenol	Glass	H ₂ SO ₄ to pH <2	<0.002
IV.	Field Analytical Dat	a (Optional)		
	рн <u>75</u> Sp	ecific Conductiv	rity <u>2120</u>	Temp <u>7 °</u>
	arance of Samples:		dop	

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Sampl	ling D	ate: <u>Feblu</u>	ney 20, 1987		
			ion: 10:15 an	ACCEPTAGE OF THE PROPERTY OF T	
			ample: Ed Cha		
Labor	ratory	Conducting .	Analysis: Hydro	- SSECO	A 500 500 500 500 500 500 500 500 500 50
WELL	No.	102D	OMR DESIGNATI	<u>on</u> co2u	
I.	Casin Casin	Data USGS Cong Elevation Material Material Material	600.81' PVC	Casing Diamete Pressure Readi H ₂ O <u>79.8</u> "	ng in inches of
	STATI	C WATER ELEV	ATION(ft) 609.67	Taken on 2-/9	-87 Time/5:25
II.	Device Mater Time	ial of Const of Well Purg	f bailing device ruction: Stainless ing: Start/Date <u>J</u> Ssc_mls/minute	s steel with silic - <i>J9 /5:J5</i> Stop/ Gallons Purged:	on stopper. Date <u>2 79 0:30</u> 30aa
III.	Signi	ling Data lficant Weath le Equipment:	er Conditions:	Tear & Cold of from purging devi	26°F ce.
Annu	al San	mple Paramete	ers		
		neters	Container	Preservative	Analytical Results
	Lead Nicke		Plastic	HNO ₃ to pH <2	<0.05 <0.05
	Нех (Chromium	Plastic	Cool to 4°C	< 0,005
	Tota:	l Cyanide	Plastic	NaOH to pH >12	< 0.02
	Naptl	halene	Glass	Cool to 4°C	<0.010
	Phene	ol	Glass	H_2SO_4 to pH <2	<0.002
IV.	Fiel	d Analytical	Data (Optional)		
	pH _	7.5	Specific Conducti	vity <u>245</u> 0_	Temp 62
Appe Misc	aranc	e of Samples es:	: Steony Sulfa	n ador	

		÷ .

Sampl	ing Date: <u>Febru</u>	AR1 20 1987	-	
	of Sample Collect:		ASSAN-ARRAMA BASEPUNYSSININYA PISIKA	
Perso	on(s) Collecting Sa	ample: Ed Chen	5222	
Labor	ratory Conducting	Analysis: Hydro	o- SSELD	
	No. 5 Deep	•		
I.	Casing Depth	596.14' Galvanized Steel 516.70	H ₂ 0 70.4	er 2" Ing in inches of " + 34" 9-87 Time /4.30
II.	Well Bailing Data Device Used: Sel Material of Const Time of Well Purg		s steel with silic /:30 2//9 Stop/	con stopper. Date/2:00 2/00
III.	Sampling Data Significant Weath Sample Equipment:	er Conditions: <i>C</i> Direct discharge	leae i Culd from purging devi	ice.
Annu	al Sample Paramete	YS		
	<u>Parameters</u> Cadmium	Container	<u>Preservative</u>	Analytical Results <0.0/0 mg/l
	Lead Nickel	Plastic	HNO ₃ to pH <2	< 0.05 < 0.05
	Hex Chromium	Plastic	Cool to 4°C	< 0.005
	Total Cyanide	Plastic	NaOH to pH >12	< 0.02
	Napthalene	Glass	Cool to 4°C	< 0.010
	Phenol	Glass	H ₂ SO ₄ to pH <2	<0.002
IV.	Field Analytical	Data (Optional)		
	рн <u>7, 9</u>	Specific Conducti	vity <u>/5 70</u>	Temp 5°C
		Clear NO O		

Samp:	ling Date: <u>Febe</u>	MRY 20 1987						
		ion: //.30 Am						
Pers	on(s) Collecting S	ample: Ed Cha	ASZE Z					
Labo	ratory Conducting	Analysis: Hydes	- SSELO	A Activity Property Comments of the Comments o				
MELL	No. 5 Shallow	OMR DESIGNATI	<u>on</u> a05u					
I.	Well Data USGS Co Casing Elevation Casing Material Casing Depth	598.27' Galvanized Steel	Casing Diamete Water Level	r 2" 3.2				
	STATIC WATER ELEV	VATION(ft) 595.0	7 Taken on $2-1$	9-87 Time 14:48				
II.	Well Bailing Date Device Used: Bai Material of Const Time of Well Bail Gallons Purged:	iler truction: PVC ling: 14.40	Date 2/19/87					
III.	Significant Weather Conditions: <u>Clear & Cold</u> Sample Equipment: Bailer							
Annu	al Sample Paramet	ers						
	<u>Parameters</u> Cadmium	Container	Preservative	Analytical Results				
	Lead Nickel	Plastic	HNO ₃ to pH <2	<0.05 <0.05				
	Hex Chromium	Plastic	Cool to 4°C	<0.005				
	Total Cyanide	Plastic	NaOH to pH >12	<0.02				
	Napthalene	Glass	Cool to 4°C	<0.010				
	Phenol	Glass	H_2SO_4 to pH <2	<0.002				
IV.	Field Analytical	Data (Optional)						
	pH <u>7.5</u>	Specific Conducti	vity <u>2470</u>	Тетр <u>5°С</u>				
Appo Mis	earance of Samples	•						

*

Sampling Date: February 20, 1987								
Time of Sample Collection:								
	n(s) Collecting Samp	_						
Labor	atory Conducting Ana	lysis: HydRo	- SSECO	A CHILA COCKITICATION AND THE PROPERTY OF THE				
MEIT	No. 2 Deep	OMR DESIGNATI	<u>on</u> G06U					
.		0.76' C 8.10	Casing Diameter Water Level 4.4					
	STATIC WATER ELEVATI	ON(1E) <u>3-600.7</u>	<u>6</u> laken on <u>∞-/7-</u> €	// lime/5:68				
II.	I. Well Bailing Data Device Used: Bailer Material of Construction: PVC Time of Well Bailing: OB; OO Date 2-20-87 Gallons Purged: Bailed to make degrees							
III.	III. <u>Sampling Data</u> Significant Weather Conditions: <u>ClcAR & Cold < 20 ° P</u> Sample Equipment: Bailer							
Annu	al Sample Parameters							
	Parameters Cadmium	Container	<u>Preservative</u>	malytical Results <0.0/0 mg/l				
	Lead Nickel	Plastic	HNO ₃ to pH <2	<0.05				
	Hex Chromium	Plastic	Cool to 4°C	<0.005				
	Total Cyanide	Plastic	NaOH to pH >12	<0.02				
	Napthalene	Glass	Cool to 4°C	<0.010				
	Phenol	Glass	H ₂ SO ₄ to pH <2	<0.002				
IV.	Field Analytical Da	ta (Optional)						
	рн <u>7.5</u> s	pecific Conductiv	ity <u>2240</u>	Temp 8°C				
	Appearance of Samples: WATER APPEARED Chalky white i had Sulfur oder. Misc. Notes: * Water was many in wall coasing, word flow water level was discussed from water level was discussed from the land water to the land of the							
water sheater is noted as greater than the top of easing elevation.								

		1Ry 20, 1987		
	of Sample Collect		, constant	
Person	n(s) Collecting S	ample: Ed Ches	522	
Labor	atory Conducting	Analysis: Hydro	- SSELO	
WELL	No. 2 Shallow	OMR DESIGNAT	<u>10N</u> A02U	·
	<u>Well Data USGS Co</u> Casing Elevation Casing Material Casing Depth	595.66' Galvanized Steel	Casing Diamete Water Level	
	STATIC WATER ELEV	VATION(ft) 586.5	56 Taken on <u>2-/9</u>	1-87 Time 14:50
	Well Bailing Dat Device Used: Ba Material of Cons Time of Well Bai Gallons Purged:	iler truction: PVC ling: <u>/4</u> :55	Date <u>1-19-97</u>	
III.	Sampling Data Significant Weat Sample Equipment	her Conditions:	CLEAR & Cold	•
Annu	al Sample Paramet	ers		
	Parameters Cadmium	Container	<u>Preservative</u>	Analytical Resultsmg/l
	Lead Nickel	Plastic	HNO ₃ to pH <2	
	Hex Chromium	Plastic	Cool to 4°C	
	Total Cyanide	Plastic	NaOH to pH >12	
	Napthalene	Glass	Cool to 4°C	
	Phenol	Glass	H ₂ SO ₄ to pH <2	
IV.	Field Analytica	Data (Optional)		
	pH	-	tivity	Temp
Appe Misc	earance of Sample	s: No Samples-	Will day AFte.	R SY HOURS

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Steel Division Ford Motor Company 3001 Miller Road Dearborn, Michigan 48121

February 24, 1983

Mr. Valdas Adamkus Regional Administrator U.S. EPA Region V 230 South Dearborn Street Chicago, IL 60604

WASTE MANAGEMENT BRANCH

Subject: Ford Allen Park Clay Mine Landfill

1982 Annual Groundwater Monitoring Report

USEPA I.D. No.: MIT2 70010093

MID980568711 TSO, PAS 1

Dear Mr. Adamkus:

In accordance with 40 CFR Part 265.94(2), following is the annual report concerning groundwater monitoring at the Ford Allen Park Clay Mine Landfill.

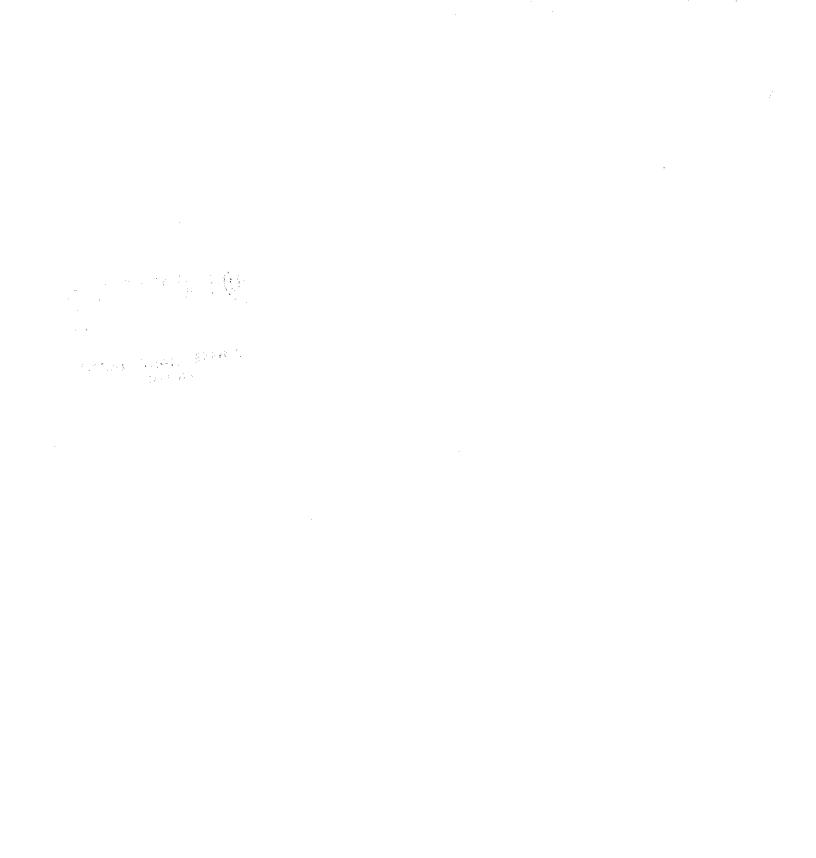
Pursuant to the requirement of S265.91 and S265.92, a groundwater monitoring system is in place at the Allen Park Clay Mine. The system for RCRA groundwater monitoring consists of five (5) wells placed in the uppermost aquifer. The wells are used to determine the impact of the hazardous waste disposal area on usable groundwater. The locations of the wells are shown on Figure 1.

The selection of wells to be sampled was based on the estimated groundwater movement contained in our original hydrogeological report as depicted in Figure 1.

On this basis, Wells 5, 102, 103, 104 and 2 have been measured for static water elevations and sampled for required RCRA parameters quarterly for the past year. Listed on Table 1 are the static water elevations recorded during the four quarterly sampling dates over the past year.

The analytical data and statistical evaluations for the contamination indicating parameters are shown in Table 2.





Mr. Valdas Adamkus February 24, 1983 Page 2

As I indicated in my letter of January 26, 1983 to the Technical Permits and Compliance Section --5HW-TUB, the artesian nature of the uppermost aquifer prohibits migration of hazardous waste leachate from the disposal cells into the aquifer. Accordingly, sampling the aquifer could not possibly indicate migration and is not warranted. Future sampling at this site will be limited to the discharge from the sediment pond which serves to collect surface water drainage around the perimeter of the landfill.

Very truly yours,

Ben C. Trethewey, Manager Mining Properties Department

Attachment

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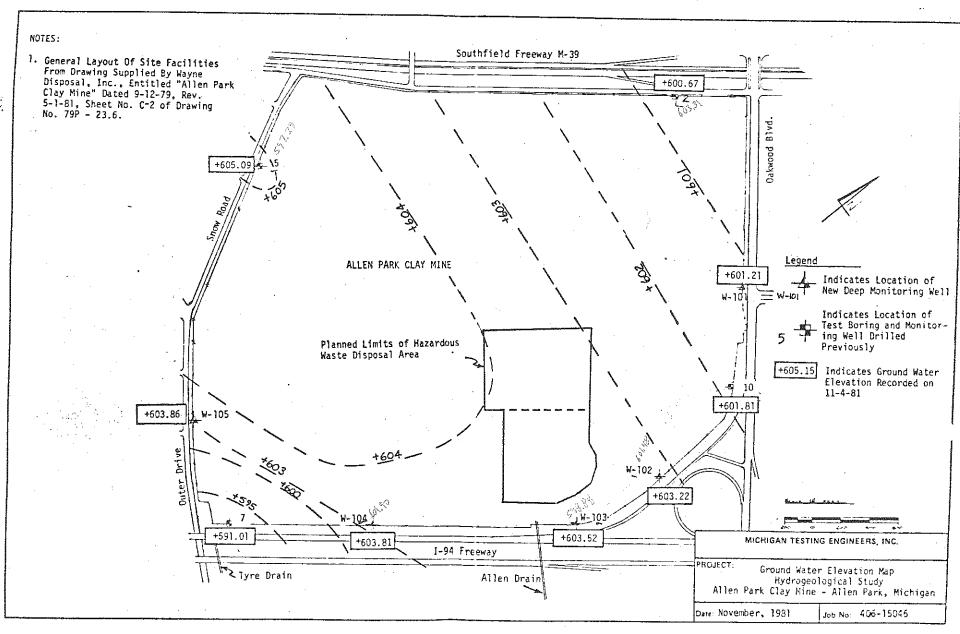


Figure 1

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Table 1

Allen Park Clay Mines Groundwater Monitoring Static Water Elevations

Well #

Date Sampled	5-D	102	103	104	2-D
8-10-81	605.09	603.22	603.52	603.81	600.67
5- 6-82	605.12	601.77	603.65	604.32	599.01
7-14-82	605.45	601.68	601.23	604.32	600.68
10-26-82	604.84	599.15	601.26	604.12	600.68

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Table 2

Allen Park Clay Mine

Ground Water Monitoring Data

Contamination Indicating Parameters

... Well: 2-D Down Gradient

	* * Well	Background	Sampling	Data * *
Date Sample	1: 08-10-81	05-06-82	07-14-82	10-26-82
Parameter Units				
Static Feet	600.67	599.01	600,68	600.68
pH1 pH2 pH3 pH4 Number of Sample Mean Value Variance	7.90	6.91 6.95 7.01 7.09 4 6.99 6.13E-03		8.70 4 8.70
Sp.Cond1 umbos/ Sp.Cond2 umbos/ Sp.Cond3 umbos/ Sp.Cond4 umbos/ Number of Sample Mean Value Variance	cm 2200. cm 2400. cm 2200. s 4 2325.0	2295. 2085. 2187. 2127. 4 2173.5 8.31E+03	3054. 2983. 2980. 2875. 4 2973.0 5.44E+03	
TOC1 mg/l TOC2 mg/l TOC3 mg/l TOC4 mg/l Number of Sample Mean Value Variance	7.70 7.00 7.70 7.60 7.50 1.13E-01	20.0 19.0 19.0 4 19.50	3,00 5,00 5,00 5,00 4,50 1,00E+00	20.0 17.0 16.0 4 17.00
TOX1 mg/l TOX2 mg/l TOX3 mg/l TOX4 mg/l Number of Sample Mean Value Variance	(0.005 (0.005 (0.005 (0.005 4 0.005 0.008	0.016 0.015 0.014 4 0.014	0.04 <i>6</i> 0.027 2 0.034	0.017 0.026

Summary of Background Data

Parameter	Mean Value	Variance	Number of Samples
рНз	7.84	3.98E-01	16
Sp.Cond:	2430.5	1.15E+05	16
TOC:	12.13	4.33E+01	1.6
TOX:	0.019	1.64E-04	16

Time of Execution: 02/23/83 0730.2 est Wed

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Allen Park Clay Mine

Ground Water Monitoring Data

Contamination Indicating Parameters

Well: 5-D Up Gradient

	* * Woll	Background	Samuling	Data * *
Date Sampled:	08-10-61	05-04-62	07-14-82	10-26-82
Parameter Units		·		
Static Feet	605.09	605.12	615,45	604,84
onl on2 on3 on4 Homber of Samples Hean Value Variance	7.60 1 7.60 0.002+00		7,44 2,50 2,67 2,60 4 7,05 1,05E+02	16.20
Su.Cond1 umbos/cm Sp.Cond2 umbos/cm Sp.Cond3 umbos/cm Sp.Cond4 umbos/cm Hember of Samples hean Value Variance		2109, 2121, 2100, 4 2122,5		
TOC1 mg/l TOC2 mg/l TOC3 mg/l TOC4 mg/l Humber of Samples Humbar Value Variance	9.00 9.00 0.03±+30		21.0 18.0 18.0 20.0 4 . 19.25 2.25E+00	
TOX1 mg/1 TOX2 mg/1 TOX3 mg/1 TOX4 mg/1 Humber of Samples Mean Value Variance	Ò	0.006 0.010 0.009 0.008 4 0.008 2.72E-06	0.064 0.032 0.026 0.026 4 8.037 3.48E-64	4.036

Summary of Background Data

Parameter	Hean Valve	Variance	Number of Samples
pH:	8.45	1.84E+09	13
Sa - Cand t	1929.8	3.01E+84	13
100:	14.09	7.475+01	13
10X±	رَين. ق	2.75£-94	12

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Allen Park Clay Mine

Ground Water Monitoring Data

Contamination Indicating Parameters

Well: 102-D Down GraDient

		* * Well	Background	Sampling	Data * *
Date 	Sampled:	08-10-81	05-06-82	07-14-82	10-26-83
Parameter	Units				
Static	Feet	603.22	601.77	601.68	599,15
pH1 pH3 pH4 Number of Mean Valu Variance	Samples Je	8.40 1 8.40 0.00E+00	7,30 2,30 2,30 7,30 7,30 4 7,30 6,36E-07	7,20 7,20 7,20 7,30 7,30 4 7,22 2,50E-03	8.70 8.70 8.70 8.70 4 8.70 0.00E+00
Sp.Cond1 Sp.Cond2 Sp.Cond3 Sp.Cond4 Number of Mean Val	umhos/cm umhos/cm umhos/cm f Samples		2975.8	2524, 2664, 2651, 2630, 4 2617,3 4,06E+03	
TOC2 TOC3 TOC4		5,60 1 5,60 0,00E+00	12.0 11.0 13.0 4 11.25	21.0 15.0 17.0 19.0 4 18.00 6.67E+00	23.0 16.0 4 19.75
TOX1 TOX2 TOX3 TOX4 Number o Mean Val		0,006 0,008 0,008 0.00E+01	0,006 0,006 0,007 1 4 3 0,008	0.010 0.010 4 0.016	(0.010 0.016 0.013 4 4 0.014

Summary of Background Data

Parameter	Mean Value	Variance	Number of Samples
рН:	7.79	4,94E-01	13
Sp.Cond:	2646.0	6.29E+84	13
TOC:	15.51	2.94E+01	13
TOX:	0.012	5.71E-05	13

Time of Execution: 02/23/83 0730.2 est Wed

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Allen Park Clav Mine

Ground Water Monitoring Data

Contamination Indicating Parameters

Well: 103-D Down Gradient

	* * Well	Background	Sampling	Data × ×
Date Sampled:	08-10-81	05-06-82	07-14-82	10-26-82
Parameter Units				•
Static Feet	603.52	603.65	601.23	601.26
pH1 pH2 pH3 pH4 Number of Samples Mean Value Variance	8.60 8.60 0.00E+00	7,02 7.09 7.11 7.12 4 7.09 2.03E-03	7.70 7.70 7.70 7.70 4 7.70 0.00E+00	8.70 8.70 8.70 8.70 4 8.70 0.00E+00
Sp.Cond1 umhos/cm Sp.Cond2 umhos/cm Sp.Cond3 umhos/cm Sp.Cond4 umhos/cm Number of Samples Mean Value Variance	300.0			2352, 2308, 2294, 2288, 4 2310,5
TOC1 mg/l TOC2 mg/l TOC3 mg/l TOC4 mg/l Number of Samples Mean Value Variance	5.60 5.60 0.00E+00	5.00 6.00 6.00 4	12.0 14.0 14.0 9.00 4 12.25 5,58E+00	26.0 21.0 22.0 21.0 4 22.50 5.67E+00
TOX1 mg/1 TOX2 mg/1 TOX3 mg/1 TOX4 mg/1 Number of Samples Mean Value Variance	0,029 1 0,029 0,00E+00	<pre></pre>	0.010 0.054 0.010 0.010 4 0.021 4.84E-04	0.010 0.010 0.014 <0.010 4 0.011 4.00F-06

Summary of Background Data

Parameter	Mean Value	Variance	Number of Samples
pHi	7.89	4.89E-01	13
Sp.Cond:	2289.5	3.72F+05	13
TOC	12.74	5.78E+01	13
TOX:	0.014	1.87E-04	13

Time of Execution: 02/23/83 0749.7 est Wed

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Allen Park Clay Mine

Ground Water Monitoring Data

Contamination Indicating Parameters

Well: 104-D Down Gradient

×	X:	Well	Background	Sampling	Data	* *

Date Sampled: 08-10-81 05-06-82 07-14-82 19-26-82

				and the second s	
Parameter	Units				
			4 0 4 77/7	604.32	604.12
Static	Feet	603.81	604.32	804.02	004,12
pH1		8.00	6.89	7.70	8.30
pH2			6.90	7.68	8.20
рна.			6.91	7.68	8,20
pH4			6.90	7.67	8.20
Number of	" ผิวพกไฮส	1	4	4	4
Mean Valu		8.00	6.90	7.68	8,23
Variance	C	0.00E+00	6.61E-05	1,58E-04	2.50E-03
Sp.Cond1	umhos/cm	2550.	1980.	2817.	2698.
Sp.Cond2	umhos/cm	2.0.0	1960.	2685,	2862 .
Sp. Cond3	emhos/cm		1980.	2885.	2838.
Sp.Cand4	umhos/cm		1920.	2852.	2871.
Number of		1	. 4	4	4
Mean Valu		2550.0	1960.0	2859.8	2867.3
Variance		0.00E+00	8.00E+02	1.05E+03	6,14E+02
TOC1	mg/1	6.60	7.00	6,00	11.0
1002	mg/l		10.0	12.0	15,0
T003	mq/1		8.00	14.0	10.0
TOC4	mg/l		8.00	12.0	12.0
	f Samples	1	4	4	4
Mean Val		6,60	8.25	11.00	12.00
		0.00E+00	1.58E+00	1.20E+01	4.67E+00
Variance		01001.00	11000		
ταχί	Mg/1	(0.005	<0.005	0.010	0.024
TOX2	Mg/l		(0.005	0.024	0.018
TOX3	mg/l mg/l		(0.005	0.010	0.010
TOX4	Mg/1	•	(0.005	0.048	0.020
	f Samples	1	4	4	4
Mean Val		០.០០5	0.005	0.023	0,018
Variance		0.005+00	0.00E+00	3,21E-04	3.47E-05
Adirection		J		*	

Summary of Background Data

Parameter	Mean Value	Variance	Number of Samples
рН:	7.63	3.09E-01	13
Sp.Cond:	2561.4	1.82E+05	13
TOC	10.12	8,20E+00	13
TOXI	0.015	1,55E-04	13

Time of Execution: 02/23/83 0730.2 est Wed

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Ford Motor Company

3001 Miller Road Dearborn, Michigan 48121

Ford Allen Park Clay Mine Landfill 1983 Annual Groundwater Monitoring Report USEPA I.D. No.: MIT2070010093 MID980568711

In accordance with 40 CFR Part 265.94(a)(2), following is the Annual Report concerning groundwater monitoring at the Ford Allen Park Clay Mine Landfill.

Pursuant to the requirements of \$265.91 and \$265.92, a groundwater monitoring system was installed at the Allen Park Clay Mine Landfill. The original system was comprised of nine (9) monitoring wells installed around the perimeter of the site and into the first usable aquifer. Attachment I shows the location of the wells in relation to the overall site and hazardous waste disposal cells.

The groundwater elevation data, Attachment III, indicates that the aquifer is artesian at the site with potentiometric elevations approximately 3-10 feet above ground surface. In view of this, sampling this aquifer could not possibly detect leachate migration from the disposal cell since there is no potential for flow from the cell into the aquifer. Conversely, the flow potential is from the aquifer to the cell leachate collection system which is monitored separately and directed to a municipal treatment plant. Accordingly, there is no potential for migration of hazardous waste from the facility and monitoring of the aquifer is not required. The demonstration, pursuant to 265.40(b), has been completed and is on file at the facility.

The entire landfill site is essentially sealed off from surface water by a clay dike system installed around the perimeter. The dike controls surface water runoff. A surface water drainage ditch was installed between the dike and property fence line to collect surface waters. The water in the ditch flows to a sediment pond prior to discharge to Allen drain and subsequently the Detroit River. The effluent from the pond is presently sampled quarterly for those parameters which caused the two hazardous wastes (KO61 and KO87) to be listed, namely naphthalene, phenol, chromium, cadmium, and lead, see Attachment II.

The surface water runoff will continue to be monitored by quarterly analysis of the surface water drainage system at the sediment pond discharge. Samples will be analyzed for naphthalene, phenol, chromium, cadmium and lead.

The results of analyses of the surface water discharge will be used to determine a facility impact. If analyses indicate a significant increase in parameter concentrations, additional samples along the perimeter of the site will be collected to determine the source of the contamination.

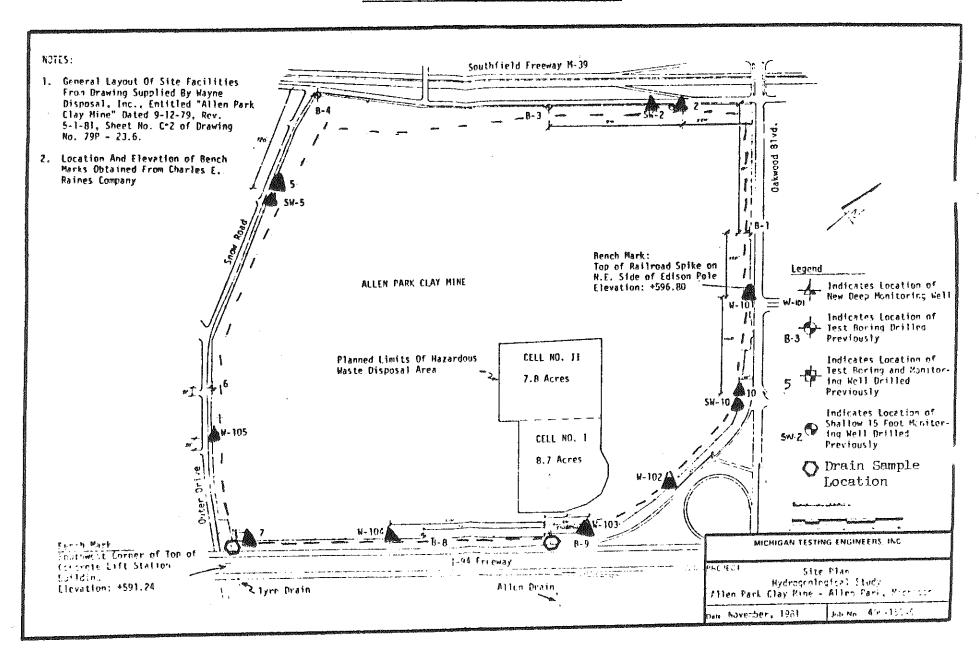
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Page 2

In the event the sampling reveals a facility impact on surface waters and it is determined not to be the result of laboratory error, written notice to the EPA will be provided within seven (7) days of such confirmation. Notification will also be made if groundwater elevation data indicate a loss of artesian conditions in the underlying aquifer.

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ACT 641 WATER MONITORING PROGRAM



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Allen Park Clay Mine

Ground Water Monitoring Data

Additional Water Quality Parameters

Sediment Pond

	Date Sampled:	05-25-82	07-14-92	10-25-92	02-23-83	09-24-83
Parameter	Units					
Phenols	mg/l	< 0.004	0.007	0.004	(0.010	(10.0
Chromium	mg/1	0.009	0.006	0.007	(0,020	(0.020
Cadmium	mg/l	<0.003	(0.003	0.003	<0.010	(0.010
Lead	mg/l	<0.010	0.010	0.010	(0.050	(0.050
Napthalene	mg/l	0.0005	0.005	1.005	(0,010	(0.005

Time of Execution: 02/14/84 0928.1 est Tue

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Allen Park Clay Mines Groundwater Monitoring Static Water Elevations

Well #

Date Sampled	5-D	102	103	104	2-D
8-10-81	605.09	603.22	603.52	603.81	600.67
5-6-82	605.12	601.77	603.65	604.32	599.01
7-14-82	605.45	601.68	601.23	604.32	600.68
10-26-82	604.84	599.15	601.26	604.12	600.68
8-24-83	605.44	601.89	603.23	603.73	600.67

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